



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

ENVIRONMENTAL SERVICES DIVISION REGION 7 25 FUNSTON ROAD KANSAS CITY, KANSAS 66115

AUG 7 1992

MEMORANDUM

SUBJECT: Transmittal of Inspection Report - RCRA

FROM: John W. Bosky

Chief, RCRA Monitoring Section, EMCM/ENSV

TO:

Thomas F. Hogan

Chief, IRMS/PSBR/WSTM

This memorandum transmits the following compliance monitoring inspection report performed by the RCRA Monitoring Section, Environmental Monitoring and Compliance Branch, Environmental Services Division. The inspection was a Level I MMI. The primary media was RCRA and the secondary SPCC.

<u>Facility</u>	EPA ID Number	Activity No	Potential Areas of Non-Compliance
Hydrocarbon Recyclers, Inc. Wichita, KS	KSD007246846	AKF88	 Leaking Containers Dented Containers Personnel Training LDR Storage >1yr. Contingency Plan

Attachments

KECEIVEL

AUG 10 1992

IRMS SECTION





RCRA INSPECTION REPORT RECEIPT AND FOLLOW-UP REQUEST

Facility Name: Hydrocarbon Recyclers, Inc.
Facility Location: Wichita KS
EPA ID Number: /CSD007246846
Date of Inspection: 7/28/92
Inspector: Kris Goschen
Activity Number: ALCO Inspection Type: ALCO
Date Report Transmitted: / /
*Date Report Received: / /
*Additional Information Requested/Needed Not Included In Report:
d'
#Photographs Taken: #Photographs in Report: *Additional Copies Needed (Specify Which)
*Additional Information Needed By: / /
Field Notes Taped [Yes/We] *Disposition: Retain, Discard, Transcribe.
#Samples Taken: #Samples Analyzed: *Disposition: Retain, Discard, Analyze more (specify which)
*Report Reviewed By:
*Date Review Completed: / /

^{*}Items to be completed by RCRA Branch, WSTM and returned to Chief, Field Investigations Section, EMCM/ENSV

REPORT OF JOINT RCRA OVERVIEW INSPECTION

AΤ

HYDROCARBON RECYCLERS, INC.

WICHITA, KANSAS

EPA I.D. NUMBER: KSD007246846

JULY 28, 1992

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

INTRODUCTION

At the request of the Waste Management Division (WSTM), a RCRA Joint Overview Inspection (JOI) was performed at Hydrocarbon Recyclers, Inc. on July 28, 1992. This inspection was performed with the Kansas Department of Health and Environment (KDHE) as a means of evaluating the effectiveness, reliability, and completeness of the state's procedures in the administration and enforcement of their hazardous waste management program established pursuant to Section 3006 of the Resource Conservation and Recovery Act (RCRA), as amended. A Level I Multi-Media Screening Inspection, secondary media SPCC, was completed while at the facility (please refer to Multi-Media report file for inspection results). This narrative report and attachments present the results of the inspection.

PARTICIPANTS

Hydrocarbon Recyclers, Inc. (HRI):
Stephen M. Keiter, Facility Manager
Ronald K. Robertson, Facility Safety and Compliance Officer
Site Address: 2549 N. New York
Wichita, KS 67219
(316) 268-9496

Kansas Department of Health and Environment (KDHE): Teresa Hansen, Environmental Technician Siew P. Kour, Environmental Engineer

U.S. Environmental Protection Agency (EPA): Kristan C. Goschen, Environmental Scientist

FACILITY DESCRIPTION

HRI is a hazardous waste management facility which receives

hazardous waste from a variety of off-site facilities. HRI engages in the on-site treatment and storage of this waste and in the shipment of this waste to its ultimate disposal site. The following major on-site waste management activities take place at HRI: 50% of all incoming waste is blended into hazardous waste fuel for cement kilns (Systec, Continental, and Pat Chemical, etc.), 30% of all incoming waste is repackaged for incineration (Rollins, Ensco, Ross, etc.), the remaining 20% of the incoming waste consists of wastewaters which are either deep well injected (Gibraltar, etc.) or used as cement kiln make-up water. Additional information about the facilities waste generation and management activities is contained in the facility's December 16, 1991 Part A and Part B application (EPA files), and in the Sept 10, 1991 KDHE inspection report (Attachment 1).

HRI currently employees 37 people in their waste management activities and they operate two 12 hour shifts per day, five days per week.

INSPECTION FINDINGS AND OBSERVATIONS

During the inspection the State inspector noted the following observations and apparent regulatory violations:

- 1. HRI is regulated as an EPA generator, eg. >1000kg/mo, under Kansas regulation K.A.R 28-31-8. They also have interim status for the treatment and storage of hazardous waste and are subject to K.A.R. 28-31-8. The facility is also subject to the requirements for a hazardous waste fuel marketer, K.A.R. 28-31-8b. The inspection was conducted based on the above regulations.
- a. It should be noted that I briefly reviewed the facilities compliance with the 40 CFR 265 Subpart BB requirements while at the facility. Kansas is currently not authorized for this portion of the RCRA regulations. No significant problems were noted during my review.
- 2. Ms. Hansen reviewed the waste streams identified during the previous inspection and noted the following changes: The tetrachloroethylene contaminated carbon scrubber filters used by the facility were now being incinerated by Rollins, Dear Park, TX, instead of being sent to Systec, Fredonia, KS; The facility's characteristic corrosive wastes are either land filled at USPCI's Lone Mountain, OK, facility or, if they carry listed waste codes, incinerated by Ensco or Rollins; The waste oil received by the facility in no longer sent to Systec as waste oil but is now blended into the hazardous waste fuel. No other significant changes were noted in the facility's waste generation or management activities.
- 3. Ms. Hansen reviewed the following facility records for the specific items noted: The personnel training records to verify

that facility personnel were trained annually or within six months of employment; The contingency plan to determine if the emergency coordinators were current; The inspection logs; The manifests, both incoming and outgoing and; The Biennial reports.

In addition to reviewing the records or portions of records identified above, Ms. Hansen verified that the facility maintained the closure/post-closure plan, waste analysis plan, financial assurance records, and liability insurance records required by TSDF's on-site. Ms. Hansen did not review of the contents of these records during the inspection. Ms. Hansen had conferred with Ms. Kour (the State permit writer) prior to the inspection and a determination was made not to conduct a thorough review the records on-site, except for the items noted above, since Ms. Kour was conducting an on-going review of the facility's Part B.

Observations noted by Ms. Hansen during the records review include:

- a. Mr. Robertson, Facility Safety and Compliance Officer, provides much of the personnel training at the HRI, however there were no records to show that Mr. Robertson had received his annual personnel training per 40 CFR 265.16.
- b. The contingency plan failed to be up-dated with the name of the current emergency coordinators. Mr. Joe Dowdey replaced Mr. James Hamilton as one of the emergency coordinators when Mr. Hamilton ceased being employed at HRI. The contingency plan was not up-dated to reflect this change per 40 CFR 265.52.
- c. No apparent problems were noted with the inspection records.
- d. A review of the manifests and LDR notices revealed that the LDR notice for one off-site generated manifest, a shipment of waste from Byron Originals Inc. to Van Waters and Rogers on manifest #92002, dated 5/14/92, and subsequently shipped from Van Waters and Rogers to HRI on manifest #92037, dated 5/26/92, failed to note the second manifest number (#92037) on the LDR notice. Ms. Hansen told Mr. Keiter that she the LDR notices need to have the correct manifest number on them and that she would review the procedures for managing brokered waste shipments and comment on the compliance status of this LDR notice in her report.
- e. No apparent problems were noted with the Biennial Reports.
- 4. Ms. Hansen did a visual inspection of all areas of the facility where hazardous wastes were generated or managed. She noted the following observations:

- a. There were three drums and three small containers of cleaning products used by HRI in Building D. HRI had labeled this material with the words "NON-HAZARDOUS WASTE." Mr. Keiter said that HRI routinely labels materials which are products as non-hazardous waste. Ms. Hansen suggested that it would be a better management practice if these containers labels did not include the word "waste" in the label name.
- Two 5-gallon containers of metallic mercury waste, with b. waste code U-151, were stored over one year. Mr. Keiter said that there were no facilities in the U.S. which could dispose of the mercury waste if it carried the U-151 waste code. He said that the waste code is used by Sheppard Air Force Base, Wichita Falls, TX. Mr. Keiter said that Sheppard AFB managed all of their mercury waste as U-151 even though it was a spent material and should be classified as D009 waste. Mr. Keiter said that he had discussed this matter with them and that they refused to change the wastes classification. Ms. Hansen reviewed file information which showed that HRI had contacted the major mercury recyclers/disposers in an effort to properly manage this shipment of waste. Ms. Hansen noted that it appeared that HRI had no alternative but to store this waste until disposal or treatment is available for the U-151 waste code.
- c. Three drums of hazardous waste were found leaking and three drums were found severely dented in Building C. Building C is an interim status container storage area and the containers need to be stored in compliance with 40 CFR 265 Subpart I. Another severely dented drum of waste was observed in Building B.
- d. No apparent problems were noted in the waste processing area or with the hazardous waste storage tanks.
- e. No apparent problems were noted with the emergency and spill control equipment.
- 5. A NOV was not issued during the inspection per KDHE procedures.

DISCUSSION OF INSPECTION

The following discussion and comments are provided as the basis for evaluating the performance of the state inspector during the inspection.

Preparation for Inspection

- 1. Ms. Hansen had thoroughly reviewed HRI's file material prior to the inspection.
- 2. Ms. Hansen had the majority of the necessary equipment and supplies, e.g., checklists, copies of regulations, safety

equipment, note pads, camera, etc., to adequately conduct the inspection.

Comments:

Ms. Hansen had arranged the necessary equipment to conduct the inspection prior to leaving her office. However, upon reaching the site and taking a few photographs, she realized that she did not have enough film left in her camera to adequately document her additional observations. I explained to her the need to carry extra film, camera batteries, etc. during the inspection, and the fact that adequate photo documentation is an essential part of the inspection process. I provided Ms. Hansen with the necessary film and she documented all observations.

Entry Procedures

- 1. The inspection was conducted during normal business hours and on an unannounced basis.
- 2. Ms. Hansen took the lead role in conducting this inspection.
- 3. Upon arrival at the facility Ms. Hansen contacted Mr. Keiter and Mr. Robertson who acted as the official facility representatives during the course of the inspection. Ms. Hansen, and I presented our credentials and Ms. Hansen explained the purpose, and scope of the inspection. She explained that the inspection would consist of a discussion of facility operations, waste generation and waste management practices, a review of the required hazardous waste management plans, programs and records, and a visual inspection of the hazardous waste management areas. Ms. Hansen also informed the facility of their right to make a confidential business information claim if they so desired.

Comments:

Ms. Hansen thoroughly explained the preliminary information to the facility representatives, however she failed to explain the authority, Section 3007 of RCRA, under which the inspection was conducted. I explained to Ms. Hansen that the initial briefing is an important part of the inspection and each of the above noted items needs to be fully explained the facility representatives.

Facility Records Check

1. Ms. Hansen verified that all waste streams were properly identified and determined the compliance status of the required records or portions of records and documents which she reviewed. Ms. Hansen first reviewed the generator status of the facility and noted all changes since the last inspection. An

inspection checklist was used during this portion of the inspection. All apparent violations were documented through photocopies and notes.

Comments:

I suggested to Ms. Hansen that she briefly review all facility's records, including those records in which Ms. Kour was reviewing for HRI's permit, for compliance with the interim status requirements since the facility does not yet have their permit. I noted that one often finds a facility is not operating as described in their Part B submittal and that the compliance status of the facility with the interim status requirements is essential until the permit is actually issued.

Site Inspection

1. Ms. Hansen inspected all areas of the facility where hazardous wastes were generated or managed. She documented all potential or apparent violations through photographs and notes.

Comments:

Ms. Hansen did a good job inspecting the container management areas and made good use of her pre-inspection notes. I suggested that during the next inspection of HRI, she spend a little more time inspecting the tank storage areas. I also suggested that she could enhance her inspection procedures by being more independent while conducting the visual portion of the inspection. Ms. Hansen did a good job varifing that the facility's emergency eye wash stations actually functioned as designed by testing several of them.

Outbriefing

1. At the conclusion of the inspection Ms. Hansen summarized and reviewed her findings and recommendations.

Comment:

The individual significance of the apparent violation related to HRI's waste management activities were fully explained during the outbriefing. Ms. Hansen summarized each of her observations and answered all of the questions that the facility representatives had.

Summary Comments

1. Ms. Hansen conducted the inspection in a professional manner. She freely questioned facility personnel about the waste management practices and the observed regulatory problems. During the questioning process Ms. Hansen avoided using leading

questions.

- 2. Ms. Hansen properly evaluated the facility's waste management practices and compliance status.
- 3. After the facility outbriefing Ms. Hansen and I discussed the overview process and my evaluation of her inspection performance. The following additional observations are noted:
- a. Ms. Hansen has conducted RCRA compliance inspection since May of 1989. She has conducted several small quantity generator inspection, 8-10 large quantity generator inspections, has accompanied other inspectors on three or four TSDF inspections, and has conducted one TSDF inspection on her own prior to this inspection.
- b. Given her level of experience and the complexity of the facility, Ms. Hansen adequately conducted this inspection. Ms. Hansen showed good judgement in contacting the permit writer, Ms. Kour, to accompany her on this inspection. Ms. Hansen and Ms. Kour worked as an efficient team during this inspection.
- 4. A Joint RCRA Overview Inspection Checklist was completed during the inspection to document the activities of the KDHE inspector (Attachment 2). Ms. Hansen's field notes are contained in Attachment 3.
- 5. A Pollution Prevention Worksheet was completed and is contained in Attachment 4.

Kristan C. Goschen

Environmental Scientist

Date: 08/04/92

Activity Number: AKF88

John W. Bosky

Chief, RCRA Monitoring Section

Date: 6/4/12

Attachments:

- 9/10/92 KDHE Inspection Report (26 pages)
- Joint Overview Checklist (4 pages)
- 3. KDHE Field Notes (8 pages)
- 4. Pollution Prevention Checklist (1 page)





Kansas Department of Health and Environment Bureau of Air and Waste Management Forbes Field, Topeka, Kansas 66620

Hazardous Waste Generator/ Transporter Compliance Inspection Report

General						
Facility Name _	Hydrocarbon Recyclers	, Inc.			Date <u>9-10</u> 007246846	-91
Street	2549 N. New York	City	Wichita		, KS Zip	67219
Mailing Address	(if different than above)					•
County	Sedgwick	••	_ Phone (316) 268-9490	
Contact(s)	Steve Keiter, Facilit	ty Manager				
	Ron Robertson,					
Inspector(s)	Ron Smith, Teresa Har	isen. Sjew Kour				
Type of Busines	sCommercial T/S/D	- Hazardous Waste	Fuel Mar	keter.		
Has the compar If yes, explain.	ny declared any information/pr	ocesses as trade secret	ts (K.S.A. 65-:		Yes (No
Industrial V (List hazardous	Vastes Generated * wastes first) *A1	so See Attached L	ist of Wa	ste Codes	. ,	•
Wasta:		Chlorinated Sol	vents	conta	chloroethyle minated wast on, filters)	ملاس ع
If waste is hazar	rdous, give H.W. ID Number:	F001/F002	:	F002	المح	Polivos
Amount general	ted per month:					Grothe
Amount present	tly in storage:					7
Accumulation ti	me:					
Present disposa	al method:	HRI, Tulsa, OK HRI, San Anton		Syste	ech, Fredonia	a, Ks.

Waste:	Flammable Wastewater	Solvent and paint solvent mixture (kiln fuel)
If waste is hazardous, give H.W. ID Number:	D001/D007/D008	D001/F003/F005
Amount generated per month:	-	
Amount presently in storage:		
Accumulation time:	a italia	
Present disposal method:	Incineration - Ropans Deep Well Injection	Systech, Fredonia, Ks.

tes	Non-blendable Wastes	0xidizers	Waste:
	D004 - D011	D001	If waste is hazardous, give H.W. ID Number:
4.2 To 1 1 2 2 3			Amount generated per month:
Corpl or	tie C		Amount presently in storage:
,	chardfill		Accumulation time:
llins or	USPCK Lone Mountain Incineration - Rolli Ensco.	Incineration - Rollins or Ensco.	Present disposal method:
	and the same of th	Ensco.	

Waste:	Blendable Wastes for Kiln Fuel	Corrosives
If waste is hazardous, give H.W. ID Number:	D001/F001/F002/F003/F005 Approved U wastes, D004 -	D002/D007
Amount generated per month:	DO11 Do 18-43	
Amount presently in storage:		- 12 listed - Inc
Accumulation time:		chinate - 128
Present disposal method:	Systech, Fredonia,Ks. and Heartland Cement, Independ	USPCI, Lone Mountain, OK. ence
	(10)	

Waste:	Non-hazardous waste- water	Used Oil	
If waste is hazardous, give H.W. ID Number:	none	none	
Amount generated per month:	-		
Amount presently in storage:	House 00		_
Accumulation time:	or Gilbrather Tracket	Blanded of	0
Present disposal method:	USPCI, Lone Mountain, OK. Or incineration Size win H - map		
Has the facility evaluated all potentially h (K.A.R. 28-31-4(b))	eazardous waste(s) to determine if it	is hazardous? Yes	. No
A. If waste(s) was tested, was the analy (K.A.R. 28-31-4(f))	sis conducted by a laboratory certifi	ed by KDHE? (Yes)	No NA
B. If waste(s) was tested, are the results		4(f)(1)(c))? (Yes)	No NA
 If hazardous waste(s) is disposed of via the Works (POTW) has written permission be (K.A.R. 28-31-3/40 CFR 261.4) 	een obtained from the operator of the	e POTW? Yes	No (NA)
II. If industrial waste(s) is disposed of at a p authorization been obtained? (K.A.R. 28-A. If yes, list the authorization number(s		esal Yes	No NA
V. Facility size classification: Not a Gen. Small Qt. Ge T/S/D Facility Transporter		⊠ EPA Gen. r Used oil Burn	er/Marketer
Hazardous Waste Determination Requirements	s: X Adequate	Inadequate	•
Notification Requirements	•		
Has generator Notified KDHE and obtaine 28-31-4(c))	ed an EFA Identification Number? (K.	A.R. Yes	No NA
L Is current Notification accurate? (K.A.R. 2 A. Is this facility marketing (selling) haza B. Is this facility marketing (selling) used (If yes, to either question A or B, complete	rdous waste as a fuel?	Yes (Yes (Yes Checklist.)	No NA No NA No NA
C. Is this facility burning hazardous wastD. Is this facility burning used oil as a fue	e as a fuel? el?	Yes Yes	NO NA
Notification Requirements:		Inadequate	□ NIA

(If small quantity generator, stop here.)

Manifest	ts			
VII. Is a co	contractual agreement used in place of manifesting? (K.A.R. 28-31-4(c))	Yes	(No)	
B. If of C. If	yes, does the contractural agreement include the type of waste and frequency of hipments? yes, is the vehicle used to transport the waste owned and operated by the reclair f the waste? yes, is a copy of the agreement kept for a period of three years after termination greement?	Yes ner	No No No	(NA) NA) NA)
VIII. Is a ct	urrent manifest showing revision date and burden disclosure statement used? (K4(d)/40 CFR 262.20)		No	NA NA
	yes, does manifest(s) include:	_		
1.		()	Na	MA
2.	Number of pages?	(Yes)	No No	NA
3.	Generators name and mailing address?	Yes	No	- :4:
4.	Generators phone number?	(Yes)	No No	·.
5.	Transporter 1 Name?	(Yes)	No	
6.	Transporter 1 EPA Identification Number?	Yes	No	
7.	Transporter 2 Name?	(Yes)	No	NA
8.	Transporter 2 EPA Identification Number?	Yes	No .	NA NA
9.	Name and site address of designated facility?	(Yes)	No	11/4
10.	Designated facility's EPA Identification Number?	(Yes)	No	
	Waste Description (DOT shipping name, hazard class, and Identification Numbe		No	
/	Number and type of containers?	(Yes)	No -	_
	Total Quantity?	(Yes)	No -	X
	Unit (weight or volume)?	, (Yes)	No	: • •
	Special handling instructions?	Yes	No	NA
	Generators certification including waste minimization statement, generators signature and date?	Yes	Na	184
17.	Name, signature and date of transporter 1?	Yes	No	
18.	Name, signature and date of transporter 2?	Yes	Na	NA
B. Do	oes generator retain a copy of manifest(s) signed by both generator and transpor (A.R. 28-31-4(d)/40 CFR 262.23)	\smile	No	
C. Do	oes generator retain copy of manifest(s) signed and dated by T/S/D/ facility wner/operator for three years? (K.A.R. 28-31-4(f)(1)(A))	Yes	No	
D. Ha ini	as generator ever failed to receive a signed copy of a manifest within 45 days of itiating a shipment?	Yes	No	
1.	If Yes, was exception report(s) filed? (K.A.R. 28-31-4(f)(4))	Yes	No	(NA)
2.	If Yes, was copy retained for 3 years? (K.A.R. 28-31-4(f)(1)(B))	Yes	No	NA
Manifesting	Requirements: X Adequate	Inadequate] NA

Land Disposal Restrictions Requirements

IX.	Does facility genera 40 CFR 268, Subpar List these wastes:	te any wastes subject to rts B and C?	o the land disposal restrictions requirem	ents of Yes	No	
	A. All Wastes	•	D			
	В		E			
			F			
X.	Is the waste(s) cove A. If Yes, describe	red by a National Variar the variance, extension	nce(s), Extension, or Petition? (40 CFR 2, or petition which applies:		No	7, 2 5
			i			
						
XI.	Is the waste covered	by an exemption? (40	CFR 268.1(c)(3))	Yes	No	
	A. If yes, does the	generator provide a pot	ice with the waste to the T/S/D facility statisposal restrictions? (40CFR 268.7(a)(3	- A?	No	(NA)
XII.	Does generator ship treatment or disposa	waste(s) covered by th	e Land Disposal Restrictions off-site for	Yes	No	
	HOTEL COOP MOST	generator provide a Not e number(s), applicable ata, if available? (40CFF	tification to the T/S/D facility that include treatment standards, manifest number(s R 268.7)	FD4	No ::	
	B. If yes, is a copy	of this notification kept i	for 5 years?	Yes)	No :	
XIII.	Does generator treat restrictions standard	restricted waste(s) on- s? (If Yes, fill out land d	site so that they are below the land disposal restrictions checklist.)	osal Yes	No	
Land	d Disposal Restrictions	s Requirements:		☐ Inadequate]NA
Pre	Transport Requ	uirements				
CV.	Does generator pack 28-31-4(e)(1))	age waste in accordance	ce with DCT requirements? (K.A.R.	Yes	Na	NA.
∾.	Does generator label DOT requirements of	(flammable liquid, pols 49 CFR 172.101 or 172	on, etc.) each package in accordance w L102? (K.A.F. 28-31-4(e)(2))	vitth Yes	No	NA
(VL	Does generator mark package in accordan 28-31-4(e)(3))	(consignee's or consignee with DOT requireme	inor's name and address, etc) on each ints of 40 CFR 172 Subpart D? (K.A.R.	Yes	No	NA
	A. Does generator r (K.A.R. 28-31-4(e	nark each container of (3))	110 gallons or less as below?	Yes	No	NA
		Hazardous Wasti If found, contact the near	e-Federal Law Prohibits Improper Disposal. rest police or public safety authority or the U.S. E	PA	•	
		Ge	nerator's Name and Address			

1-5

Manifest Document Number

XVII.	Doe: Subj	s generator have placards to offer to part F? (K.A.R. 28-31-4(e)(4))	o transporters in accordance with 49 CFR 1	72 (Yes	s) No	NA
XVIII.	Doe: (K.A.	s generator only use a transporter w R. 28-31-4(g))	who is properly registered with the departme		<	NA NA
Pre	Trans	port Requirements:	Adequate	Inadequa	ite	□ NA
Bie	nnia	Reports				
XIX.		***************************************	ort(s) to KDHE? (K.A.R. 28-31-4(f)(2)))	
			for three years? (K.A.R. 28-31-4(f)(1)(B))	Yes	ζ	NA NA
Bier	nial R	eport Requirements:		☐ Inadequa	te	
				, •	•	
Spe	cial	Conditions	•			
XX.	Has (generator received or transported as FR Subpart E)	ny hazardous waste to or from a foreign sou	urce? Yes)* No	r v neere i rosenegg.
	A. If	Yes, has generator filed a Notice w	vith the Secretary of Health and Environmen	it? Yes	No	NA.
	B. Is	s waste manifested and signed by a	foreign consignee?	Yes) No	NA
	C. 11	nipment been received?	the country, has confirmation of delivered	Yes	No ;	(NA)
S	alal Ca		explanation from facility.			
Spec		nditions Requirements:	Adequate	Inadequat	te [NA ·
Sto	rage	Requirements		•		1
XXI.	Does	generator temporarily store waste :	before transport?	' Yes) No	\$160 0000
	A F	or 90 days or less?	•	Yes) Na	NA
	3. F	or more than 90 days?		Yes) No	NA
	C. If	waste is stored in containers:			,	
	1.	Are containers marked with the wo (h)(1)(D))	ords: "Hazardous Waste"? (K.A.R. 28-31-4(g)(3) or Yes	No	NA
	2.	Is the accumulation start date mar (h)(1)(C))	rked on each containers? (K.A.R. 28-31-4(g)	(2) or Yes	No	NA
	3.	Are all containers holding hazardo necessary to add or remove waste	ous waste closed during storage except whe e? (K.A.R. 28-31-4(g)(1) or (h)(1)(B))	en (Yes)) No	NA
	4.	Does generator conduct weekly in and/or deterioration caused by con	ispections of containers for signs of leakage rosion or other factors? (K.A.R. 28-31-4(k))	e Yes) No	NA
		inspection, full name of inspec	ocumented in a log that includes date and octor, notations of observations, and date and (A.R. 28.31.4(d)) (A.R. 28.31.4(d))	time of) No	NΔ

	•	-			
5.	164	e containers holding ignitible or reactive waste(s) located at least 15 meters (50 et) from the facility's property line? (EPA Generator and T/S/D Only) (K.A.R31-4(g)(1))	Yes	No	N/
6.		waste in containers is incompatible with other materials stored nearby, are the ntainers separated from the other materials by means of a dike, berm, wall, or ner means? (K.A.R. 28-31-4(g)(1) or (h)(1)(B))	Yes	No	n NA
7.	Do If y	pes generator have any satellite storage areas? (K.A.R. 28-31-4(j)) ves,	Yes	No	N.A
	a.	Is the waste stored in a container at or near the point of generation and under the control of the operator of the process generating the waste?	(Yes)	No	
	b.	Is the container in good condition and closed except to add or remove waste?	(Yes)	No	
	C.	Is the container marked with the words: "Hazardous Waste"?	Yes	No	,
	d.	Is the container marked with the accumulation start date at the time it becomes full?	Yes	No	- - :
	€.	Is the full container moved to the storage area within 3 days after it became full?	Yes	No	•.
	(If v	waste(s) is placed in tanks, piles, or surface impoundments complete the propriate inspection checklist.)		٠	-
		ė.			

Sto	rage Requirements:	Adequate	Inadequate]NA	
Kar	nsas Generator's Emergency Prepare	edness				
XXII.	Has facility named one employee as emergency co		Yes	No		
	A. Is the emergency coordinator available to responsible facility within a short period of time?		**	No		
	B. Is the emergency coordinator or his/her design emergencies (fires, spills, or releases) that arise	ee prepared to respond to any	- Yes	No 		
	C. Is the emergency coodinator familiar with the re 28-31-4(h)(2)?	eporting requirements of K.A.R.	Yes	No		
XXIIL	Is the following information posted next to at least of associations associated in an emergency: (K.A.R. 28-31 (h)(1)	one telephone which is immediately (F)	y			
	A. Name and telephone of emergency coordinator		Yes	No		
	B. Location of fire extinguishers, fire alarms, or spi	III control material, if available?	Yes	No		
	C. Telephone number of fire department unless the	e facility has a direct alarm?	Yes	No	NA	
XXIV.	emergency procedures that are relevant to their res	iliar with proper waste handling an ponsibilities during normal facility				
	operations? (K.A.H. 28-31-4(h)(1)(G))	•	Yes	No		
/	A. Is this training documented in any way?		Yes	No	-	
Kan	sas Generator's Emergency Preparedness Requirem	ents: Adequate	Inadequate]NA	

(If Kansas generator, stop here.)

Preparedness and Prevention

XXV.	If a	appropriate, based upon the nature and quantity of wastes generated and stored at the cility, is the facility equipped with:			
	A.	Internal communication or alarm system easily accessible in case of emergency? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(a))	Yes	No	N.
	В.	Telephone or hand-held two-way radio capable of summoning emergency response personnel? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(b))	Yes	No	N.
	C.	Portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(c))	Yes	No	N.
	D.	Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(d))	Yes	No	N,
	E.	is this equipment (A-C above) tested and maintained to assure its proper operation? (K.A.R. 28-31-4(g)(4)/40 CFR 265.33)	Yes	No	N
XXVI.	Do per	es a check of the facility show sufficient aisle space to allow unobstructed movement of rsonnel and equipment? (K.A.R. 28-31-4(g)(4)/40 CFR 265.35)	Yes	No	- N/
XXVII.	. If a	ppropriate for the type(s) of waste handled, has the owner/operator made the following angements:	· · · · · · · · · · · · · · · · · · ·		
-	A.	Familiarized the local emergency authorities with the facility, wastes handled, entrances and exits? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(1))	Yes	No	. N/
***************************************	В.	Designated one authority where one or more police or fire departments might respond to an emergency? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(2))	Yes	No	N/
	C.	Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(3))	Yes	7 - 65 No	N/
	D. (Familiarized local hospitals with the properties of hazardous waste handled and types of injuries which could result from fires, explosions, or releases at the facility? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(4))	Yes	No	N.A
XXVIII	l. In c	cases where local authorities decline to enter into such arrangements, is the refusal ered in the operating record? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(b))	Yes	No	N/
Prep	ærec	iness and Prevention Requirements: Adequate Inad	equate		INA
Pers	son	inel Training			
XXIX.	Has (K.A	s the owner/operator established a hazardous waste management training program?	Yes	No	•
		Is the program directed by a person trained in hazardous waste management? (40 CFR 265.16(a)(2))	· Yes `	. No	
	В.	Are new personnel trained within six months after their employment? (40 CFR 265.16(b))	Yes	No	
	C.	Are new employees supervised until training is completed? (40 CFR 265.16(b))	Yes	No	
	D.	After initial training, are employees trained on an annual basis? (40 CFR 265.16(c))	Yes	No	

É.	Does the facility maintain the following documents and records:		
	 Job title and job description for each position related to hazardous waste management? (40 CFR 265.16(d)(1) & (2)) 	Yes	No
	 Description of type and amount of training to be given each person? (40 CFR 265.16(d)(3)) 	Yes	No
	3. Records of training given to facility personnel? (40 CFR 265.16(d)(4))	Yes	No
Personr	nel Training Requirements:	Inadequate	
	•		
Contin	igency Plan		
XXX. Do	es the facility have a contingency plan? (K.A.R. 28-31-4(g)(4)/40 CFR 265 Subpart D) les,	Yes	No
A	Does the plan list the names(s), home address, and phone numbers of designated emergency coordinator(s) in the order in which they should be contacted? (40 CFR 265.52(d))	Yes	No
В.	Is an emergency coordinator available at all times? (40 CFR 265.55)	Yes	No
C.	Does the plan describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? (40 CFR 265.52(a))	Yes	No
D.	Does the plan describe arrangements made with emergency response agencies? (40 CFR 265.52(c))	Yes	No
E.	Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? (40 CFR 265.52(e))	Yes	No
F.	Does the plan include an evacuation plan for facility personnel that describes signals and evacuation routes? (40 CFR 265.52(f))	Yes	No
G.	Have copies of the plan been provided to outside emergency response agencies and hospitals? (40 CFR 265.53)	Yes	No
		·	
Continge	ency Plan Requirements:	Inadequate	

(if EPA generator, stop here.)

Transpo	rter Requirements			
XXXI. Does	this facility transport hazardous waste?		Yes	No
A. A.	re they registered as a hazardous waste transport 8-31-6 (b))	er in the State of Kansa	as? (K.A.R. Yes)	No
B. D.	oes transporter comply with the manifest requiren 53.20(h)?	nents of 40 CFR 263.20	except , (Yes)	No
, C. D	oes transporter retain a copy of the manifest for the	ree years? (40 CFR 26	3.22(a)) (Yes)	No
D. De 28	oes this facility transport hazardous waste subject 3-31-4(d)(7)? yes,	to the manifest exemp	otion of K.A.R.	No
1.	Does the transporter record the name, address, a generator, quantity of waste shipped, DOT shippi waste was accepted in a log or shipping paper?	and EPA ID number of ing information, and the	e date the	No (NA
2.	Does the transporter carry this record when trans reclamation facility?	sporting the waste to th	res Yes	No (NA
3.	Does the transporter retain these records for a petermination or expiration of the agreement?	eriod of three years after	er the	No (NA
Transporter	Requirements:	Adequate	☐ Inadequate	□NA
	Additional informatio	n and concl		
		ii and oone	4310113.	
, ,				· · · · · · · · · · · · · · · · · · ·
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		·		
				·

MIKS HAYDEN
GOVERNOT
JACK D WALKER M D
Secretary

STATE OF KANSAS



Forbes Field Tope-all KS 66621-0011 (913) 862-9360

DEPARTMENT OF HEALTH AND ENVIRONMENT

RCRA Compliance Inspection Report

T/S/D Facilities Checklist

, M	General	•				
	Date 9-10-91	Time	8:30 AM	EPA ID N	10	KSD007246846
	Facility Name_	Hydrocarbon F	lecyclers, Inc	•		
7.3 7	Street	2549 N. New \	ork			
	City	Wichita		, Kansas	Zip	67219
	County	Sedgwick		Phone (316)	268-	9490
	Contact	Steve Keiter	, Facility Mar	nager		
	.» Inspector	Ron Smith, T	eresa Hansen,	Siew Kour		1
	Other					
·3.	Activity at Si	te				٠
	Treatmen	<u>t</u>	Storage			<u> Siscosai</u>
	Chem/Phys/	Bio Trestment	ארטווני ע	· · · · · · · · · · · · · · · · · · ·	* #**	incineration
	Filtration	1	2552			
		i an	\$115° 3	ca imponumen	Ξ.	בחם "רפבים פחם
	Recycling	Recovery	<u> </u>	Above ground		
	Reprocess	ing	Tank,	Below ground		Other (
	X Solvent R	ecovery	Other	• ()		
	Thermal T	reatment				
	yolume Re	duction	*			· · · · · · · · · · · · · · · · · · ·
	Waste Oil	·				
	Other ()				

; · · ·	Comme	:		 :
			· ·	
c.	Waste Analy	sis Plan		
265.13		cility maintain a copy of its waste analysis the facility?	YES	NO
	A. If	yes, does the plan include:		•
TERTAL PROCESS	1.	Parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters.	YES	МО
A STATE OF THE STA	2.	Test methods which are used to test for these parameters.	YES	NO
	3.	Sampling method used to obtain sample.	YES	NO
	4.	Frequency with which the initial analysis will be reviewed or repeated to ensure the analysis is current.	YES	NO
	5.	For off-site facilities, the waste analyses that generators have agreed to supply.	YES	, סא
	5.	For off-site facilities, the procedures which are used to inspect and analyze each movement of hazardous waste received to ensure that it matches the identity of the waste designated on the manifest.	(YES)	
the diff of these makes his a surregulation			\cup	
asta analysis pla	•		· · · · · · · · · · · · · · · · · · ·	
IXI yasansts	[] Inac	ecuata		
3.	Security	- facility provide either of the following:		
265.14	a. A 2	ne facility provide either of the following: 24-hour surveillance system? (T.V. monitoring guards).	YES	(10)
	c) (at	artificial or natural barrier (fence, fence and off combination) and a means to control entry trandant, T.V. monitoring, locked entrance, controlled roadway access).	(5)	10

		2.	Does the facility provide warning signs at entrances.	(YES) NO
		3.	Does the facility consider itself exempt from security requirements?	YES NO
Secu	rity requ	irements:		
	[X] Adeq	uate	[] Inadequate [] Not Applicable	*
		E. Gen	eral Inspection Requirements	
	265.15	1.	Does the owner/operator maintain a written schedule at the facility for inspecting:	
•	i de la companya de l	lu 14 + + − . .d	a. : Monitoring equipment	YES NO
•	:		b. Safety and emergency equipment	YES NO
* 2		o en de de de la companya de la comp La companya de la co	c. Security devices	YES NO
	•	. •	d. Operating and structural equipment	YES NO
Tr.		2. Trans	Does the inspection schedule identify the types of problems which are to be looked for during the inspections?	YES NO
		3.	Does the owner/operator maintain an inspection log?	VES V
·		•	a. If yes, does the log contain the:	
			 Date and time of inspection 	YES N
•	The second secon	. ,	2. Name of inspector	(E3) H
•			3. Notation of observations	YES N
	٠		4. Vata and nature of repairs or remedial action	YES (H

[X] Inadequata [] Adequate

F. Parsonnel Training

1. Boes the owner/operator maintain at the facility, the following documents and records: 253.15

YES NO
YES NO
YES NO
tes
? YES NO
YES: NO
YES NO
YES NO
VES NO
YES NO
. 1
YES NO
led
OEE .IO

•					
		Are portale fire extinguishers, fire atrol equipment, spill control equipment, and decontamination equipment provided?	YES	НО	N <i>F</i>
	4.	Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.?	YES	МО	Ná
265.33	5.	Is this equipment (1-4 above) tested and maintained to assure its proper operation?	YES	ЮК	N,
265.35	6.	Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment?	YES	NO)	N.
265.37	7.	If appropriate for the type(s) of waste handled has the owner/operator made arrangements with the local emergency authorities to familiarize them with the layout of facility, properties of wastes handled and associated hazards, places where facility			
		personnel normally work, entrances to roads inside facility, and possible evacuation routes?	YES	NO	ħ
	8.	In areas where more than one police and fire department might respond, is there one designated authority?	YES	NO	(1
	9.	If appropriate for the type(s) of waste handled does the owner/operator have agreements with State emergency response teams, emergency response con- tractors, and equipment suppliers?	YES	NO	.(
	19.	If appropriate for the type(s) of waste handled has the owner/operator arranged to familiarize local hospitals with the properties of nazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility?	<u>(1)</u>) NO	ļ
	11.	In cases where state or local authorities sections to enter into such arrangements, is the refusal entered in the operating record?	YES	NC) (
•		and the second remains of	Ŧ.		
		ention requirements:			
[] Adeq	uate	[X] Inadequate	<u> </u>	<u></u>	
	I. <u>Car</u>	ntingency Plan and Emergency Procedures			
262.53	1.	Is a contingency olan maintained at the facility and have copies been provided to outside agencies which may be called upon to provide emergency services?	(=	· · ·	0

262.52

loes the plan describe arrangements made with amergency response personnel?

		٥.	חשף	er(s) of the designated emergency coordinator(s)?	(FES)	NO
	265.55	4.	Is a	n emergency coordinator available at all times?	(YES)	NC-
		5.	ment tion	the plan include a list of all emergency equip- at the facility, its location, a physical descrip- of each item on the list, and a brief outline ts capabilities?	(ES)	NO
		6.		the plan include an evacuation plan for facility onnel?	YES	NO
Con	tingency plan	and e	merge	ncy procedures requirements:		
· · · · · · · · · · · · · · · · · · ·	[X] Adequate	74396° 31 - 27	[] [nadequate		-
- 1.25	J.	Man	ifest	System, Recordkeeping, and Reporting	. •	
.*	265.71	1.	Does	the facility receive waste from off-site?	YES	NO
		ವೇ <i>ಚಿತ್</i>	a.	If yes, does the owner/operator sign and date each copy of the manifest and give a signed copy to the transporter?	YES	NO
•			b.	Does the owner/operator send a signed copy of the manifest to the generator within 30 days of the delivery?	(55)	7O
	•		c.	Does the owner/operator retain a copy of manifest?	(YE3)	NO
	1945 1946 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946	2.		the facility receive any waste from a rail or wat k shipment) transporter?	er., ZES	(0::0
	•		ā.	If yes, is the snipment accompanied by a shipping paper containing the appropriate information?	:E 3	ЖC
				If yes, does the owner/operator sign and date the shipping paper and provide the transporter with a copy?	:5	.43
				2. Does the owner/operator send a signed copy of the shipping paper to the generator within 30 days of the delivery?	YES	NO.
				3. Joes the owner/operator retain a copy of the shipping paper?	75 5	МC
	365.72	3.	tas ver	the facility received any shipments of wasta which a inconsistant with the manifast?		: <u>40</u>

	•		a.	If y	yes, was an attempt made to recordile the dis- bancy with the generator and transporter?	YES	ΝС	
				1.	If no, was the Regional Administrator notified?	YES	NG ((
	265.73	4.	Does at t	the	e owner/operator keep a written operating record facility?	YES	МО	
			a.	If	yes, does the operating record include:			
				1.	A description and the quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, and disposal?	YES	МО	
				2.	The location of each hazardous waste within the facility and the quantity at each location?	YES	МО	
. 7 .				3.	Records and results of waste analyses?	YES	NO	
				4.	Reports and details of incidents requiring implementation of the contingency plan?	YES	NO	(
•	•	•		5.	Records and results of required inspections?	YES	NO.	
				6.	Monitoring, testing, or analytical data?	YES	NO	
		enilos Partiros Partiros		7.	Closure cost estimates (and for disposal facilities, post-closure cost estimates)?	YES	NO	*
	265.76	5.	fai:] ur	e facility received any waste, which does not nder the small generator exclusion, not actied by a manifest or snipping paper?	/ES	(10))
			a.	If	yes, was an unmanifested waste report submitted the Regional Administrator?	YĘS	MO	
٠	• •	•						_
					•			

Manifest system, recordkeeping, and reporting requirements:

XI Adequate [] Inacequate

Clasure and Post-Clasure

265.112 1. Does the owner/operator have a written closure plan for the facility?

VES NO

a. If yes, does the plan include:

 A description of how and when the facility will be closed?

(55) (10

•	2.	description of the steps necessary to completely close the facility?	YES	NO .
	3.	An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the facility life?	YES	NC '
	4.	A description of the steps needed to decontaminate facility equipment at the time of closure?	YES	Ю
	5.	An estimate of the expected year of closure and a schedule for final closure which includes the total time required to close the facility and the time required for intervening closure activities which allow tracking closure progress?	YES	NO
265.118 2.	If the owner/o	facility is a disposal facility, does the perator have a written post-closure plan?	YES	йо (и
		yes, does the plan include:		
	1.	Ground-water monitoring activities and frequencies at which they will be performed?	YES	NO ()
	2. ∴ેં∴માં	Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment structures where applicable, and the function of the monitoring equipment?	YES	NO (1
	3.	The name, address, and phone number of the person or office to contact during the post-closure period?	YES	NC (
Closure and post-clos	mie Leda.	irements:		•
X Adecuate	[] Inac	iequata		
<u>. = :</u>	nanctal '	Requirements .		
255.142 1	Does to the cl	he owner/operator have a written estimate of osure cost?	YES	NC
255.143 2	CHEADC	e owner/operator established financial as- e for facility closure and notified the al Administrator? (Required after 1-6-82).	(E)	90
265.144 3	cost	facility is a disposal facility, loss the operator have a written estimate of the annual of post-closure monitoring and maintenance of cility?	YES	s no

- 265.145
- 4. Has the owner/operator of the disposal facility established financial assurance for post-closure care and notified the Regional Administrator? (Required after 7-6-82)

YES NO (NA

- 265.147
- 5. Has the owner/operator obtained liability insurance for sudden occurrences of at least \$1 million with an aggregate of at least \$2 million exclusive of legal defense costs? (Effective 7-15-82).

YES) NO

6. If the facility is a disposal facility, has the owner/operator obtained liability insurance for nonsudden and accidental occurrences of at least \$3 million per occurrence with an annual aggregate of at least \$6 million exclusive of legal defense costs? (Effective 7-15-82)

YES NO (

Financial requirements:

[X] Adequate

[] Inadequate

M. - Management of Containers

- 265.170
- 1. Are containers presently used to store hazardous waste?



- a. If no, do not complete questions 2-5.
- b. If yes, check condition of containers and for evidence of incompatibility of waste with containers.

Condition of Containers:

- 265.173

 2. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste?

(<u>==</u>)

- 265.174
- 3. Goes owner/operator inspect areas where containers are stored, at least weekly, for signs of leakage and/or deterioration caused by corrosion or other factors?

(E3) 40

	•				•			
	265.176	4.	Are containers located at lea property line?	st 15 meters (tible or reactive (50 feet) from t	he facility's	YES	NO,
	265.177	5.	materials stor	ed nearby, in surface impos the other ma	ncompatible with other containe undments, are terials by mean?	he containers	YES	NO
	•					· · · · · · · · · · · · · · · · · · ·		, <u></u> ,
Mana	gement of C	Contain	ers:			•		
	[X] Adequa	ite	[] Inadequate	[] Not Ap	plicable			
	Note:	Determ	ine if owner/op	erator claims	any information	n confidential	•	-
÷	Note:	Fill o	ut applicable c tanks, surface lls, groundwate	hecklists for impoundments,	specific facili piles, land tr	ity types		
	Additiona] Infor	mation and CONC	LUSIONS				
•								-
	T 	<u>.</u>						
	•		· ·					
						-		
					•	•		
	Form:	TSD 4/	82					



Kansas Department of Health and Environment Bureau of Waste Management Forbes Field, Topeka, Kansas 66620 (913) 296-1600

Tank Inspection Checklist

Owne	er Info	rmation							
Date	9-10-91		EPA I.I	D. No	KSD0072468	46			
Facility Name Hydrocarbon Rec		Recyclers, I	nc.						
Street		2549 N. New	York						
City	· .	Wichita			, Ka	insas Zip	67219	·	
Tank	Inforn	nation							=
•	·	Tank #1		Tank #2		Tank #3			
Description	n:	SEE ATTACHE	D SHEET.			·			
Capacity:	. •			. ,	:	·			
Substance	Stored:	-							
Waste Cod	de:		·						
Location:		•					1		
robod seit, sebes i telepis (6		nk Systen		:s Waste"? (K∠	A.R. 28-31-4)		Yes	No	-
il. If:	Is the tank(s) labeled with the words "Hazardous Waste"? (K.A.R. 28-31-4) If the tank(s) is not covered, does it have at least 2 feet (60 cm) of freeboard unless equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would provide? (40 CFR 265.192(c))							No	NA
	Is the tank(s) equipped with a waste-feed cutoff or bypass system(s) as required by 40 CFR 265.192(b and d)?								
IV. Ar	Are daily inspections made of all systems pertinent to the proper operation of the tank?				of the tank?	Yes	No		
Α	Dischar	ge and cutoff syst	ems?			**	Yes	No	NA
В.	Tank le	vel and freeboard	?				Yes	No	(NA)
. C .	Drainag	je systems?	,				Yes	No	NA

	D.	Above-ground portions for consion?	Yes	No	·. NA
	E.	Monitoring and leak detection equipment?	Yes	No	NA NA
	F.	Secondary containment?	Yes	No	NA NA
V.	Are	these inspections documented in a log?	Yes	No	
	A.	In the case of a permitted T/S/D facility, do they follow the inspection schedule outlined in their permit?	Yes	No	NA
VI.	Ha wa	s the tank(s) been used to treat or store wastes substantially different from previous stes or have substantially different treatment processes been used in the tank(s)?	Yes	No	
	A .	If yes, were waste analyses and trial treatment or storage tests conducted prior to implementing the proposed changes and is all the data kept on file in the facility operating record or was written, documented information on similar storage or treatment process changes obtained prior to implementing the proposed changes and is all documentation kept on file in the facility operating record?	Yes	No	NA
VII.	Wit the	h the exception of emergency situations, have ignitable or reactive wastes been placed in tank(s) by the facility?	Yes	No	NÃ
	A.	If yes, has the facility insured the safety of the operation by one or both of the following methods (40 CFR 265.98)?	*		
		1. Was the waste treated immediately before or after being placed in the tank(s) so that it is no longer ignitable or reactive and such treatment is done in compliance with the safety requirements of 40 CFR 265.15(b)?	Yes	No	NA
<u>.</u> , .,		2. Was the waste stored or treated under protected conditions eliminating the possibility of ignition or reaction?	Yes	No	NA
VIII.	if a	covered tank(s) is used to treat or store ignitable or reactive wastes, does the facility et the NFPA buffer zone requirements? (40 CFR 265.198(b))	Yes	No	NA
IX.	ACT 11	compatible waste materials are placed in the same tank(s) or are put in a contaminated (s), is this done under completely controlled and safe conditions as specified in 40 CFR .199?	Yes	No⊶	NA
X	if th	e tank(s) has cathodic protection systems, is it inspected according to the following edule (40 CFR 265.195(b))?	Yes	No	NA .
	A.	Was proper operation confirmed within 6 months of installation and annually thereafter?	Yes	No	(NA)
	В.	Are induced current sources inspected/tested at least bimonthly?	Yes	No	(NA)
	C.	Are records maintained of these inspections?	Yes	No	NA)
XI.	Was	the tank(s) used for the management of hazardous waste prior to July 14, 1986?	Yes	No	NA
	A.	If yes, does the tank system(s) have secondary containment?	Yes	No	NA
	B.	If no, has a written assessment that attests to the integrity of the tank(s) been prepared by an independent registered engineer?	Yes	No	NA ·
If yes,	did th	e assessment include the following: 1. Design standards according to which the tank and ancillary equipment were constructed?	Yes	No	

	¥	2.	Existing corrosion profile on measures?	Yes	No	NA
		3.	Hazardous characteristics of the waste to be handled?	Yes	No	_
		4.	Documented age of the tank system (if available) or estimate of the age?	Yes	No	
		5.	Results of a leak test, internal inspection, or other tank integrity examination? (If the results of this test show the tank to be leaking or unfit for use, the owner must implement 40 CFR 265.196.)	Yes	No	
		6.	is the leak test conducted annually by an independent, qualified, registered engineer? (40 CFR 265.193(i)(1) and (2))	Yes	No	
		7.	Are records of the assessment results maintained on file at the facility?	Yes	No	
Sched	ule da	ate wh	en secondary containment is required per schedule in 40 CFR 265.193(a) (1 through	5).		
Exis	ting	Tank:	System(s) Adequate		Inadeq	uate
					-	. ·
Ne	wī	anl	k System(s)		***************************************	
di.			system(s) required to have secondary containment (new system or according to n 40 CFR 265.193(a)(1 through 5)?	Yes	No	
	A.	If yes	s, has the owner or operator requested a variance from the secondary ainment? (40 CFR 265.193(g and h)	Yes	No	NA
	В.	If yes	s, does the secondary containment meet the following minimum requirements? (40 265.193(b and c)			
ų.		1.	Constructed of or lined with materials compatible with the waste and of sufficient strength?	Yes	No.	NA
7	•	2.	Placed on a structurally adequate foundation?	Yes	No	NA
		3.	Provided with a leak detection system capable of detecting releases within 24 hours?	Yes	No	NA
		4.	Adequately sicped or designed and operated to drain and remove liquids from leaks, spills or precipitation?	Yes	No	NA
	C.	If yes 265-	s, does the secondary containment include one of the following: (40 CFR 193(d))			
	,	1.	External liner?	Yes	No	NA
		2.	Vault?	Yes	No	NA
		3	Double-wailed tank?	Vaa	(Na)	NIA

Equivalent device approved by the Secretary?

Yes

	D.		s, does the secondary containment satisfy the following requirements (40 CFR 193(e))			•
For Ext	erna	l Line 1.	es and Vaults Adequate capacity to contain 100% of the largest tank within its boundary?	Yes	No	NA
		2.	Designed or operated to prevent infiltration of precipitation into the containment system unless it has adequate capacity to contain a 25 year, 24 hour rain event?	Yes	No	NA
•		3.	Free of cracks or gaps?	Yes	No	NA
		4.	Completely surrounds the tank and surrounding earth likely to be exposed to waste if a release occurs?	Yes	No	NA
For Va	uits					
		1.	Constructed with chemical-resistant water stops at all joints?	Yes	No	NA
		2.	Provided with an impermeable coating or lining over the concrete?	Yes	No	NA
•		3.	Protected against vapor ignition, if required due to the waste characteristics?	Yes	No	(NA)
. •		4.	Provided with an exterior moisture barrier?	Yes	No	(NA)
For Do	uble-	Wall	ed Tanks Designed as an integral structure for containment of releases?	Yes	No	NA
		2.	If metal, is it protected from corrosion, if metal?	Yes	No	NA
		3.	Provided with a built-in continous leak detection system capable of detecting releases within 24 hours?	Yes	No	NA
XIII.	is an	cillar	y equipment provided with adequate secondary containment? (40 CFR 265-193(f))	Yes	No	NA
XIV.			ank system or secondary containment system had a leak or spill or was it ed to be unfit for use?	Yes	No) NA
	A.	lf ye take	es, was it immediately removed from service and appropriate follow-up actions en as required by 40 CFR 265.196 (b through e)?	Yes	No [:]	NA
XV.	with	40 C	ve repair has been conducted on the tank system was it recertified in accordance : FR 270.11(d) and such certification submitted to the Secretary within 7 days? (40 196(f))	Yes	No	NA
New	Tan	k Sy:	stem Requirements Adequate		Inade	quate
Commo	ents:					
-						
		·	·		<u>.</u>	
	٠,					
						4.89

Hazardous Waste Tank Storage (S02) Service¹

VESSEL	CAPACITY - WORK (gal)	CAPACITY - MAX (gal)	LOCATION
V-1	7,181	7,363	Process Area
V-2	7,084	7,084	Process Area
V-3	7,181	7,363	Process Area
V-4	7,181	7,363	Process Area
v.\$	20,895	20,895	Process Area
V-6	20,895	20,895	Process Area
V-7	7,181	7,363	Process Area
V-8	7,181	7,363	Process Area
V-9	5,078	· 5,078	Building D
V-10	5.078	5,078	Building D
V-11	5,078	5,078	Building D
V-12	5,078	5,078	Building D
V-13	5,078	5,078	Building D
V-14	5,078	5,078	Building D
V-15A	2,659	2,659	Building D
V-15B	2,659	2,659	Building D
V-15C	2,659	2,659	Building D
V-15D	2,659	2,659	Building D
V-16	9,028	9,028	Building D
V-17	522	5,22	Process Area
V-18	489	489	Building D
V-25	1,129	1,155	Process Area
V-29	90	90	Building D
V-30	90	90	ر جهجو
V-31	115	115	3ಆನೆಯ್ಯ ೨
V-32	115	115	Suibčug D
V-34	539	539	Process Area
TOTAL	138,000	138,936	N/A

Attachment 2

SOP No. FROOZA

Attachment No. 1

JOINT RCRA OVERVIEW INSPECTION CHECKLIST

Date of Inspection:	7/28/92	
Facility Name/Location _	Hydrocarbon Recyclers, Inc.	
• • • • • • • • • • • • • • • • • • •	2549 N. New York	
· _	Wichita KS 67219	
Facility Phone Number:	(316) 268-9490	•
Facility EPA/State ID No	umber(s): <u>KSD007246846</u>	
		-
Facility Cassification:	Generator Transporter TSD acility	
	Resource Recovery Facility	
Participants:	Name Title	
Facility:	Steve Keite Fault Manager	
	Rom Robertson Sality & Fur. Myn-	
State:	Teresa Hansen Environmental Technicien	
	Sper Kour Environmental Engineer	
EPA:	Kris Goschen Engronmental Scientist	
		÷
SPECTION EVALUATION (S	= Satisfactory, U = Unsatisfactory)	
	Remarks/suggestions for improvement	
Preparation for Inspec		-
A Inspection Tools		_
Inspection Tools Intry Procedures Facility Information V Records Check	Carification	
S Facility Information v	Per il i Cacioni	
Site Inspection		
S Documentation		
Cluthriefing		
S Unspection Technique	4	!
Comments:		

SECTION A - Preparation for	or Inspection	YES	ו סא	N/A
1 Paviewed following fa	cility information/files		-	
a. Notification				
b. Part A Application	s and/or permit	 		
c. Previous inspectio	n reports		 	
d. Letters, correspon	dence, misc.	1		
	EPA/other state personnel			
3. Was knowledgeable of	regulations			
4. Had performed previou	c PCPA inspections	1		
4. Had performed previous	with facility	1		
5. Was overall familiar	with factivey			
6. Had inspected this fa	Cility previously			1
7. Had contacted facilit	y to provide	ł		
notification of in	spection		<u> </u>	<u> </u>

Comments:

SECTION B - Inspection Tools

	Adequate individual safety equipment		1
1.	Adequate individual safety equipment	- V	
2.	Brought camera and film		
3.	Brought copy of regulations		
4.	Brought copies of appropriate checkinsus		
5.	Brought files on facility		
6.	Brought adequate writing material		
7.	Field NOV (if applicable)		

Comments:

2. She did not have extra film available after she ran out. I provided her with film so she could complete her inspection

SECTION C - Entry Procedures

1. Did inspector attempt to contact designated			
official/representative? 2. If designated official/representative was not			
available did inspector determine that spokes !	1		~
marker was authorized to speak (U) lactively.			
3. Was facility provided prior notification of		_	
inspection by inspector?			1
4. If entry was denied, did inspector follow			
ostablished state procedure:			
C Did increased present his credentials:			
The disconnection available authority (of hispection.	-	 	
7 Did inspector explain reason for hispection.			
8. Did inspector explain facility 5			
	 	/	
9. Did inspector explain how the inspection			
would proceed?	1	_ 	J

6. Failed to explain anthority, Sect. 3000 2(RA, to

ECTION D - Facility Information Verification	YES	NO	N/A		1
! -			1		1
Obtained information on processes/					
perations at facility Identified and quantified all wastes generated.	س			-	
	1		 		.}
 Wastes were properly classified. Method of determining hazardous waste 	. /	•	1		
			 		-
Methods of handling and disposal of wastes			1		1
- determined					-
Information contained in notification, Part A		•			
pplication and/or permit was verified		<u> </u>			_1
omments:					
	,				
SECTION E - Records Check					
and evaluate the		1	1		
. Did the inspector inspect and evaluate the					_
following records in detail? a. Manifests					_
b. Inspection records					-
c. Operating records	1		*		-
C. Operating	1	<u> </u>	104		!
d. Waste Analyses	 				_
d. Waste Analyses e. Personnel Training records					_
e. Personnel Training records f. Annual reports	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \				_
 e. Personnel Training records f. Annual reports 2. Did inspector inspect and evaluate the following plans/programs to determine compliance with requirements?					
e. Personnel Training records f. Annual reports 2. Did inspector inspect and evaluate the following plans/programs to determine compliance with requirements? a. Preparedness and prevention					
e. Personnel Training records f. Annual reports 2. Did inspector inspect and evaluate the following plans/programs to determine compliance with requirements? a. Preparedness and prevention b. Contingency plan					
e. Personnel Training records f. Annual reports 2. Did inspector inspect and evaluate the following plans/programs to determine compliance with requirements? a. Preparedness and prevention b. Contingency plan c. Groundwater Monitoring					
e. Personnel Training records f. Annual reports 2. Did inspector inspect and evaluate the following plans/programs to determine compliance with requirements? a. Preparedness and prevention b. Contingency plan c. Groundwater Monitoring d. Clasure/post-clasure					
e. Personnel Training records f. Annual reports 2. Did inspector inspect and evaluate the following plans/programs to determine compliance with requirements? a. Preparedness and prevention b. Contingency plan c. Groundwater Monitoring d. Closure/post-closure e. Financial assurance/liability					
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e. Personnel Training records f. Annual reports 2. Did inspector inspect and evaluate the following plans/programs to determine compliance with requirements? a. Preparedness and prevention b. Contingency plan c. Groundwater Monitoring d. Closure/post-closure e. Financial assurance/liability 3. Did inspector utilize appropriate checklists?					
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e. Personnel Training records f. Annual reports 2. Did inspector inspect and evaluate the following plans/programs to determine compliance with requirements? a. Preparedness and prevention b. Contingency plan c. Groundwater Monitoring d. Closure/post-closure e. Financial assurance/liability 3. Did inspector utilize appropriate checklists? 4. Did inspector obtain photocopies? Comments: 1. Waske Analysis flam was not evaluated in John Section 1. Did inspector visually inspect and fully evaluate each area of the facility were hazardous wastes are generated or managed? 2. Were photographs taken to document		TC.	LP:	đị Su	Spect -
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SECTION G - Documentation of Inspection			•
JEG (TOTT)	YES	NO - N/	<u> </u>
1. Did inspector take adequate notes?			
2. Did inspector obtain photocopies of specific records, reports, etc. to document			
deficiencies?	+		
3. Did inspector complete applicable checklists to document results of inspection?			
4. Did inspector take photographs to document			
observations?			

Comments:

SECTION H - Outbriefing

1. Did inspector explain deficiencies/ violations to responsible official?			
2. Was a Notice of Violation issued?			
a. Were all deficient items noted?			
h. Were regulatory cites correct?	-		
3. Did inspector require facility to take		1	
any actions to correct deficiencies?Did inspector adequately address any questions			
4. Did inspector adequately address any questions	1		
<pre>from facility? 5. Were receipts provided for materials received</pre>	1		./
5. Were receipts provided for materials received			ν
on-site?	لــــــــــــــــــــــــــــــــــــــ	-لــــــــــــــــــــــــــــــــــــ	

Comments:

3. Overpack leaking containers

SECTION I - Inspection Technique	1	1
1. Did inspector avoid leading questions?		
2. Did inspector use probing questions to		1
obtain information?		
Was inspector thorough in his/her inspection?		
A Did inspector interpret regulations properly:		
5. Were all regulatory requirements reviewed	1/*	
and evaluated?	 	
6. Did inspector effectively determine facility's		
Compliance status?		_1

Comments:

Attach ment 5
D Building -
Oakite parts clearer- product. 3 druns labeled non-haz waste.
3- Sm. overpacks- storage labeled non-haz. Waste.
1- Salvage
7 - RO wasto Mercury Metallic Orm-B 3-12-91 Accumulation start date. 59 allon container
? Waste Incidical Dry-Bromite Won-ray.
1-RQ Waste Mercury Metallic (5 gaelog) no date
- RQ Mercury Metallic - accum. date 4/92 only (no day)
U151 Code) no disposal Outlet

redoing n. side of Bldg D. Shapard AFB, Wichita Falls, I Apache Corp. Lipocomb County Cracking of floor

Tank Storagerocessing and - Woote tho washer rinsates. Dreum Scraper - Cleaned and of overy styt

foris from Bldg to Lovement. 3rd. deun E. C701-Oryptalizing at bottom. label & mot visuble 707- Serverly dented

10 Pon's latest training - Conducts all Omplage training. 2LDR no en wooter received Seman manifest Corres pond Jano Chamilton no I \$14/92 1 Inc. 182163527 92002 92037 NWR #.

3-6

OSHA Regal prod. to be tabled up product name.) abeled act drums la recuy Metallic >1 racking of creating them interm of where needed 2 alums uj C715 C725 C727 -1 leaking on 727-Spillar

Bldg. B floor cracked Severely dented dum. - perc. worstes training > Lyr & Changes: on Emergency Coordinator - When will: the Changes be submitted. specific cross reference nus man jest and old Attachment 4

POLLUTION PREVENTION WORKSHEET

1. Do the manifests used by the facility certify that a pollution prevention program is in place (specific wording listed under 40 CFR 262 Appendix): Yes No Further Explanation:
2. Does the facility biennial report contain a description of pollution prevention efforts and achievements (specific requirements listed under 40 CFR 262.41 a.6 & a.7, 264.75 h & i, and 265.75 h & i): Yes No Further Explanation:
3. If facility is a permitted TSD, does the operating record contain an annual certification that a pollution prevention program is in place (specific wording listed under 40 CFR 264.73 b.9): YesNON/A
4. Does the facility have a written pollution prevention program: Yes No Further Explanation:
IF YES, ATTEMPT TO OBTAIN A PHOTOCOPY; COPY ATTACHED: YES NO $\frac{\mathcal{X}}{}$
5. If the facilty does not have a written pollution prevention program, does the facility have an unwritten program that can be verbally described: Yes No N/A Further Explanation:
SUMMARY OF VERBAL DESCRIPTION: Schreed of grind all weste polleto
NOTE: THERE IS NO REQUIREMENT FOR A POLLUTION PREVENTION PROGRAM TO BE WRITTEN, AND SPECIFIC REGULATORY CRITERIA HAVE NOT BEEN ESTABLISHED FOR POLLUTION PREVENTION PROGRAMS. THE INSPECTOR SHOULD NOT CONDUCT A TECHNICAL REVIEW OF WRITTEN OR VERBAL PLANS.
6. If the facility has a written or verbal pollution prevention program, is this program actually being implemented: Yes No Further Explanation:
7. Is facility complying with any additional pollution prevention requirements established by a permit or enforcement action: Yes
8. ENCOURAGE THE FACILITY TO BEGIN/CONTINUE POLLUTION PREVENTION EFFORTS: Accomplished
9. PROVIDE THE FACILITY WITH THE FOLLOWING INFORMATION:
Appropriate Fact Sheet(s): Accomplished // Multimedia plus industry specific if appropriate: State Contact Information: Accomplished // Clearinghouse Information: Accomplished // Clearinghouse Information: Accomplished

Dough VED

AUG 7 1992

MEMORANDUM

SUBJECT: Transmittal of Inspection Report - RCRA

FROM: John W. Bosky

Chief, RCRA Monitoring Section, EMCM/ENSV

TO: Thomas F. Hogan

Chief, IRMS/PSBR/WSTM

This memorandum transmits the following compliance monitoring inspection report performed by the RCRA Monitoring Section, Environmental Monitoring and Compliance Branch, Environmental Services Division. The inspection was a Level I MMI. The primary media was RCRA and the secondary SPCC.

Facility	EPA ID Number	Activity No	Potential Areas of Non-Compliance
Hydrocarbon Recyclers, Inc. Wichita, KS	KSD007246846	AKF88	 Leaking Containers Dented Containers Personnel Training LDR Storage >1yr. Contingency Plan

Attachments

kgoschen: 08/04/92

EMCM FG EMCM

EWCW K

REPORT OF JOINT RCRA OVERVIEW INSPECTION

AΤ

HYDROCARBON RECYCLERS, INC.

WICHITA, KANSAS

EPA I.D. NUMBER: KSD007246846

JULY 28, 1992

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

INTRODUCTION

At the request of the Waste Management Division (WSTM), a RCRA Joint Overview Inspection (JOI) was performed at Hydrocarbon Recyclers, Inc. on July 28, 1992. This inspection was performed with the Kansas Department of Health and Environment (KDHE) as a means of evaluating the effectiveness, reliability, and completeness of the state's procedures in the administration and enforcement of their hazardous waste management program established pursuant to Section 3006 of the Resource Conservation and Recovery Act (RCRA), as amended. A Level I Multi-Media Screening Inspection, secondary media SPCC, was completed while at the facility (please refer to Multi-Media report file for inspection results). This narrative report and attachments present the results of the inspection.

PARTICIPANTS

Hydrocarbon Recyclers, Inc. (HRI):
Stephen M. Keiter, Facility Manager
Ronald K. Robertson, Facility Safety and Compliance Officer
Site Address: 2549 N. New York
Wichita, KS 67219
(316) 268-9496

Kansas Department of Health and Environment (KDHE): Teresa Hansen, Environmental Technician Siew P. Kour, Environmental Engineer

U.S. Environmental Protection Agency (EPA):
Kristan C. Goschen, Environmental Scientist

FACILITY DESCRIPTION

HRI is a hazardous waste management facility which receives

hazardous waste from a variety of off-site facilities. HRI engages in the on-site treatment and storage of this waste and in the shipment of this waste to its ultimate disposal site. The following major on-site waste management activities take place at HRI: 50% of all incoming waste is blended into hazardous waste fuel for cement kilns (Systec, Continental, and Pat Chemical, etc.), 30% of all incoming waste is repackaged for incineration (Rollins, Ensco, Ross, etc.), the remaining 20% of the incoming waste consists of wastewaters which are either deep well injected (Gibraltar, etc.) or used as cement kiln make-up water. Additional information about the facilities waste generation and management activities is contained in the facility's December 16, 1991 Part A and Part B application (EPA files), and in the Sept 10, 1991 KDHE inspection report (Attachment 1).

HRI currently employees 37 people in their waste management activities and they operate two 12 hour shifts per day, five days per week.

INSPECTION FINDINGS AND OBSERVATIONS

During the inspection the State inspector noted the following observations and apparent regulatory violations:

- 1. HRI is regulated as an EPA generator, eg. >1000kg/mo, under Kansas regulation K.A.R 28-31-8. They also have interim status for the treatment and storage of hazardous waste and are subject to K.A.R. 28-31-8. The facility is also subject to the requirements for a hazardous waste fuel marketer, K.A.R. 28-31-8b. The inspection was conducted based on the above regulations.
- a. It should be noted that I briefly reviewed the facilities compliance with the 40 CFR 265 Subpart BB requirements while at the facility. Kansas is currently not authorized for this portion of the RCRA regulations. No significant problems were noted during my review.
- 2. Ms. Hansen reviewed the waste streams identified during the previous inspection and noted the following changes: The tetrachloroethylene contaminated carbon scrubber filters used by the facility were now being incinerated by Rollins, Dear Park, TX, instead of being sent to Systec, Fredonia, KS; The facility's characteristic corrosive wastes are either land filled at USPCI's Lone Mountain, OK, facility or, if they carry listed waste codes, incinerated by Ensco or Rollins; The waste oil received by the facility in no longer sent to Systec as waste oil but is now blended into the hazardous waste fuel. No other significant changes were noted in the facility's waste generation or management activities.
- 3. Ms. Hansen reviewed the following facility records for the specific items noted: The personnel training records to verify

that facility personnel were trained annually or within six months of employment; The contingency plan to determine if the emergency coordinators were current; The inspection logs; The manifests, both incoming and outgoing and; The Biennial reports.

In addition to reviewing the records or portions of records identified above, Ms. Hansen verified that the facility maintained the closure/post-closure plan, waste analysis plan, financial assurance records, and liability insurance records required by TSDF's on-site. Ms. Hansen did not review of the contents of these records during the inspection. Ms. Hansen had conferred with Ms. Kour (the State permit writer) prior to the inspection and a determination was made not to conduct a thorough review the records on-site, except for the items noted above, since Ms. Kour was conducting an on-going review of the facility's Part B.

Observations noted by Ms. Hansen during the records review include:

- a. Mr. Robertson, Facility Safety and Compliance Officer, provides much of the personnel training at the HRI, however there were no records to show that Mr. Robertson had received his annual personnel training per 40 CFR 265.16.
- b. The contingency plan failed to be up-dated with the name of the current emergency coordinators. Mr. Joe Dowdey replaced Mr. James Hamilton as one of the emergency coordinators when Mr. Hamilton ceased being employed at HRI. The contingency plan was not up-dated to reflect this change per 40 CFR 265.52.
- c. No apparent problems were noted with the inspection records.
- d. A review of the manifests and LDR notices revealed that the LDR notice for one off-site generated manifest, a shipment of waste from Byron Originals Inc. to Van Waters and Rogers on manifest #92002, dated 5/14/92, and subsequently shipped from Van Waters and Rogers to HRI on manifest #92037, dated 5/26/92, failed to note the second manifest number (#92037) on the LDR notice. Ms. Hansen told Mr. Keiter that she the LDR notices need to have the correct manifest number on them and that she would review the procedures for managing brokered waste shipments and comment on the compliance status of this LDR notice in her report.
- e. No apparent problems were noted with the Biennial Reports.
- 4. Ms. Hansen did a visual inspection of all areas of the facility where hazardous wastes were generated or managed. She noted the following observations:

- a. There were three drums and three small containers of cleaning products used by HRI in Building D. HRI had labeled this material with the words "NON-HAZARDOUS WASTE." Mr. Keiter said that HRI routinely labels materials which are products as non-hazardous waste. Ms. Hansen suggested that it would be a better management practice if these containers labels did not include the word "waste" in the label name.
- b. Two 5-gallon containers of metallic mercury waste, with waste code U-151, were stored over one year. Mr. Keiter said that there were no facilities in the U.S. which could dispose of the mercury waste if it carried the U-151 waste code. He said that the waste code is used by Sheppard Air Force Base, Wichita Falls, TX. Mr. Keiter said that Sheppard AFB managed all of their mercury waste as U-151 even though it was a spent material and should be classified as D009 waste. Mr. Keiter said that he had discussed this matter with them and that they refused to change the wastes classification. Ms. Hansen reviewed file information which showed that HRI had contacted the major mercury recyclers/disposers in an effort to properly manage this shipment of waste. Ms. Hansen noted that it appeared that HRI had no alternative but to store this waste until disposal or treatment is available for the U-151 waste code.
- c. Three drums of hazardous waste were found leaking and three drums were found severely dented in Building C. Building C is an interim status container storage area and the containers need to be stored in compliance with 40 CFR 265 Subpart I. Another severely dented drum of waste was observed in Building B.
- d. No apparent problems were noted in the waste processing area or with the hazardous waste storage tanks.
- e. No apparent problems were noted with the emergency and spill control equipment.
- 5. A NOV was not issued during the inspection per KDHE procedures.

DISCUSSION OF INSPECTION

The following discussion and comments are provided as the basis for evaluating the performance of the state inspector during the inspection.

Preparation for Inspection

- 1. Ms. Hansen had thoroughly reviewed HRI's file material prior to the inspection.
- 2. Ms. Hansen had the majority of the necessary equipment and supplies, e.g., checklists, copies of regulations, safety

equipment, note pads, camera, etc., to adequately conduct the inspection.

Comments:

Ms. Hansen had arranged the necessary equipment to conduct the inspection prior to leaving her office. However, upon reaching the site and taking a few photographs, she realized that she did not have enough film left in her camera to adequately document her additional observations. I explained to her the need to carry extra film, camera batteries, etc. during the inspection, and the fact that adequate photo documentation is an essential part of the inspection process. I provided Ms. Hansen with the necessary film and she documented all observations.

Entry Procedures

- 1. The inspection was conducted during normal business hours and on an unannounced basis.
- 2. Ms. Hansen took the lead role in conducting this inspection.
- 3. Upon arrival at the facility Ms. Hansen contacted Mr. Keiter and Mr. Robertson who acted as the official facility representatives during the course of the inspection. Ms. Hansen, and I presented our credentials and Ms. Hansen explained the purpose, and scope of the inspection. She explained that the inspection would consist of a discussion of facility operations, waste generation and waste management practices, a review of the required hazardous waste management plans, programs and records, and a visual inspection of the hazardous waste management areas. Ms. Hansen also informed the facility of their right to make a confidential business information claim if they so desired.

Comments:

Ms. Hansen thoroughly explained the preliminary information to the facility representatives, however she failed to explain the authority, Section 3007 of RCRA, under which the inspection was conducted. I explained to Ms. Hansen that the initial briefing is an important part of the inspection and each of the above noted items needs to be fully explained the facility representatives.

Facility Records Check

1. Ms. Hansen verified that all waste streams were properly identified and determined the compliance status of the required records or portions of records and documents which she reviewed. Ms. Hansen first reviewed the generator status of the facility and noted all changes since the last inspection. An

inspection checklist was used during this portion of the inspection. All apparent violations were documented through photocopies and notes.

Comments:

I suggested to Ms. Hansen that she briefly review all facility's records, including those records in which Ms. Kour was reviewing for HRI's permit, for compliance with the interim status requirements since the facility does not yet have their permit. I noted that one often finds a facility is not operating as described in their Part B submittal and that the compliance status of the facility with the interim status requirements is essential until the permit is actually issued.

Site Inspection

1. Ms. Hansen inspected all areas of the facility where hazardous wastes were generated or managed. She documented all potential or apparent violations through photographs and notes.

Comments:

Ms. Hansen did a good job inspecting the container management areas and made good use of her pre-inspection notes. I suggested that during the next inspection of HRI, she spend a little more time inspecting the tank storage areas. I also suggested that she could enhance her inspection procedures by being more independent while conducting the visual portion of the inspection. Ms. Hansen did a good job varifing that the facility's emergency eye wash stations actually functioned as designed by testing several of them.

Outbriefing

1. At the conclusion of the inspection Ms. Hansen summarized and reviewed her findings and recommendations.

Comment:

The individual significance of the apparent violation related to HRI's waste management activities were fully explained during the outbriefing. Ms. Hansen summarized each of her observations and answered all of the questions that the facility representatives had.

Summary Comments

1. Ms. Hansen conducted the inspection in a professional manner. She freely questioned facility personnel about the waste management practices and the observed regulatory problems. During the questioning process Ms. Hansen avoided using leading

questions.

- 2. Ms. Hansen properly evaluated the facility's waste management practices and compliance status.
- 3. After the facility outbriefing Ms. Hansen and I discussed the overview process and my evaluation of her inspection performance. The following additional observations are noted:
- a. Ms. Hansen has conducted RCRA compliance inspection since May of 1989. She has conducted several small quantity generator inspection, 8-10 large quantity generator inspections, has accompanied other inspectors on three or four TSDF inspections, and has conducted one TSDF inspection on her own prior to this inspection.
- b. Given her level of experience and the complexity of the facility, Ms. Hansen adequately conducted this inspection. Ms. Hansen showed good judgement in contacting the permit writer, Ms. Kour, to accompany her on this inspection. Ms. Hansen and Ms. Kour worked as an efficient team during this inspection.
- 4. A Joint RCRA Overview Inspection Checklist was completed during the inspection to document the activities of the KDHE inspector (Attachment 2). Ms. Hansen's field notes are contained in Attachment 3.
- 5. A Pollution Prevention Worksheet was completed and is contained in Attachment 4.

Kristan C. Goschen

Environmental Scientist

Date: 08/04/92

Activity Number: AKF88

John W. Bosky

Chief, RCRA Monitoring Section

Date: 8/6/12

Attachments:

- 9/10/92 KDHE Inspection Report (26 pages)
- Joint Overview Checklist (4 pages)
- 3. KDHE Field Notes (8 pages)
- 4. Pollution Prevention Checklist (1 page)

Attachment I



Kansas Department of Health and Environment Bureau of Air and Waste Management Forbes Field, Topeka, Kansas 66620

Hazardous Waste Generator/ Transporter Compliance Inspection Report

		***************************************				Contract the Contract
	•		Time	8:30 AM	Date	9-10-91
Facility Name	Hydrocarbon Recyclers,	, Inc.	EPA	ID No. K	SD0072468	46
Street	2549 N. New York	City	Wichita		, ks	Zip 67219
Mailing Address	s (if different than above)					
County	Sedgwick		Phone	316	268	-9490
Contact(s)	Steve Keiter, Facilit	y Manager				
	Ron Robertson,					····
nspector(s)	Ron Smith, Teresa Han	sen, Sjew Kour	·			
Type of Busines	Commercial T/S/D	- Hazardous Wast	e Fuel Ma	rketer.	September 1997	200 - 200 -
(List hazardous	Wastes Generated * s wastes first) *A1	so See Attached	List of W	laste Coo	les.	,
87. Zupacio Jakobi, zo udbe G		so See Attached Chlorinated So		Te	des. ; trachloroentaminated	l wastes
(List hazardous				Te	trachloroe ntaminated arbon, fil	ters) (spin s
(List hazardous Waste:	s wastes first) *A1	Chlorinated So		Ter cor (ca	trachloroe ntaminated arbon, fil	l wastes
(List hazardous Waste:	s wastes first) *A1 ardous, give H.W. ID Number: ated per month:	Chlorinated So		Ter cor (ca	trachloroe ntaminated arbon, fil	ters) (spin s
(List hazardous Waste: If waste is haza	ardous, give H.W. ID Number: ated per month: htty in storage:	Chlorinated So		Ter cor (ca	trachloroe ntaminated arbon, fil	ters) (spin s

Waste:		
	Flammable Wastewater	Solvent and paint solvent mixture (kiln fuel)
If waste is hazardous, give H.W. ID Number:	D001/D007/D008	D001/F003/F005
Amount generated per month:		
Amount presently in storage:		
Accumulation time:	Gilbalty	
Present disposal method:	Incineration - Rollins Deep Well Injection	Systech, Fredonia, Ks.

remains the stage was the con-

A CONTRACTOR OF THE PROPERTY O	
0xidizers	Non-blendable Wastes
	n expensión La significación de la companya de l
D001	D004 - D011
au Truccie Maria (1945) TELLA S	
	Landfill
Incineration - Rollins or Ensco.	USPCK, Lone Mountain, OK. Incineration Rollins or Ensco.
	D001 Incineration - Rollins or

Blendable Wastes for Kiln Fuel	Corrosives
	D002/D007
D011 D00 18-43	•
	- IF listed - In-
	christic and
Systech, Fredonia,Ks. and Heartland Cement, Independ	USPCI, Lone Mountain, OK.
	D001/F001/F002/F003/F005 Approved U wastes, D004 - D011 Om 18-43 Systech, Fredonia, Ks. and

Waste:	Non-hazardous waste- water	Used Oil		
If waste is hazardous, give H.W. ID Number:	none	none		
Amount generated per month:				
Amount presently in storage:	House 00			
Accumulation time:	or Gulbrold Jean Trahet	Bladed of		
Present disposal method:	USPCI, Lone Mountain, OK. or incineration System Was H - making	Systech, Fredonia	a, Ks.	
I. Has the facility evaluated all potentially I (K.A.R. 28-31-4(b)) A. If waste(s) was tested, was the analysis	nazardous waste(s) to determine if it		No No I	NA.
(K.A.R. 28-31-4(f)) B. If waste(s) was tested, are the result				NA NA
II. If hazardous waste(s) is disposed of via Works (POTW) has written permission b (K.A.R. 28-31-3/40 CFR 261.4)	the sanitary sewer to a Publicly Own een obtained from the operator of the	ed Treatment e POTW? Yes		NA)
III. If industrial waste(s) is disposed of at a pauthorization been obtained? (K.A.R. 28 A. If yes, list the authorization number(-29-23)		No (I	NA
V. Facility size classification: Not a Gen. T/S/D Facility Transporter			/Marketer	
Hazardous Waste Determination Requiremen	ts: X Adequate	Inadequate		
Notification Requirements	•			
Has generator Notified KDHE and obtain 28-31-4(c))	ned an EPA Identification Number? (K	CAR. Yes	No !	NA
 Is current Notification accurate? (K.A.R. A. Is this facility marketing (selling) haz B. Is this facility marketing (selling) use (If yes, to either question A or B, comple 	ardous waste as a fuel? d oil as a fuel?	(Yes) (Yes) (Yes) (Yes) (Yes)	No 1	NA NA NA
C. Is this facility burning hazardous wasD. Is this facility burning used oil as a full	ste as a fuel? uel?	Yes Yes	No No	NA NA
Notification Requirements:	X Adequate	Inadequate	Пи	Δ

(If small quantity generator, stop here.)

Manifest	S			
VII. Isac	ontractual agreement used in place of manifesting? (K.A.R. 28-31-4(c))	Yes	No	
si B. if Oi C. if	yes, does the contractural agreement include the type of waste and frequency of ipments? yes, is the vehicle used to transport the waste owned and operated by the reclaimer the waste? yes, is a copy of the agreement kept for a period of three years after termination of greement?	Yes Yes Yes	No No No	NA NA NA
VIII. Is a c 28-31	urrent manifest showing revision date and burden disclosure statement used? (K.A.R4(d)/40 CFR 262.20)	Yes	No	NA
. A. If	yes, does manifest(s) include:		**	****
1.	Generator EPA Identification Number (twelve digit) and manifest document number (five digit)?	Yes	No	NA
2.	Number of pages?	Yes	No	
· 3.	Generators name and mailing address?	(Yes)	No	
4.	Generators phone number?	(Yes)	No	
5.	Transporter 1 Name?	(Yes)	No	
6.	Transporter 1 EPA Identification Number?	(Yes)	No	
7.	Transporter 2 Name?	(Yes)	No	NA
8.	Transporter 2 EPA Identification Number?	(Yes)	No <u>.</u>	NA
9.	Name and site address of designated facility?	(Yes)	No	
	. Designated facility's EPA Identification Number?	(Yes)	No	
. 11	. Waste Description (DOT shipping name, hazard class, and Identification Number)?	(Yes)	No	
12	Number and type of containers?	(Yes)	No	\times
3 13). Total Quantity?	(Yes)	No	
14	l. Unit (weight or volume)?	Yes)	No .	المجاورة الدياريون المحاورة الدياريون
	5. Special handling instructions?	' (Yes)	No	NA
16	Generators certification including waste minimization statement, generators signature and date?	Yes	No	
17	7. Name, signature and date of transporter 1?	Yes	No	
	3. Name, signature and date of transporter 2?	Yes	No	NA
В.	Does generator retain a copy of manifest(s) signed by both generator and transporter? (K.A.R. 28-31-4(d)/40 CFR 262.23)	Yes	No	•
C. ·	Does generator retain copy of manifest(s) signed and dated by T/S/D/ facility owner/operator for three years? (K.A.R. 28-31-4(f)(1)(A))	Yes	No	
D.	Has generator ever failed to receive a signed copy of a manifest within 45 days of initiating a shipment?	Yes	No)
1	. If Yes, was exception report(s) filed? (K.A.R. 28-31-4(f)(4))	Yes	No	(NA
2	. If Yes, was copy retained for 3 years? (K.A.R. 28-31-4(f)(1)(B))	Yes	No	(NA
Manifesti	ng Requirements:	nadequate)	□NA

La	nd Disposal Restr	ionorio riequiren		n 2000, 2000 (2000) (2000) (2000) (2000) (2000) (2000) (2000) (2000) (2000) (2000) (2000) (2000) (2000) (2000)			
IX.	Does facility generate a 40 CFR 268, Subparts List these wastes:	any wastes subject to the B and C?	ne land disposal restrictions requi	irements of	Yes	No	
	A. All Wastes.	· .	D				
	В		E				
			F				
X.	Is the waste(s) covered A. If Yes, describe the	l by a National Variance variance, extension, or	e(s), Extension, or Petition? (40 C r petition which applies:	FR 268 5&6)	Yes	No	1, 1 1, 1
							
	•						
XI.	Is the waste covered by	an exemption? (40CF	R 268.1(c)(3))	o en la representa de la composición d La composición de la	Yes	No	te agricus
	A. If yes, does the ger	nerator provide a notice	with the waste to the T/S/D facili posal restrictions? (40CFR 268.7	ty stating (a)(3))	Yes	No	(NA)
XII.	Does generator ship watereatment or disposal?	aste(s) covered by the L	and Disposal Restrictions off-site	e for the second	Yes	No	
	A. If Yes, does the general hazardous waste n	nerator provide a Notific	cation to the T/S/D facility that inc	ludes: FPA			
	waste analysis data	a, if available? (40CFR 2	eatment standards, manifest num 68.7)	ber(s), and	(Yes)	: No :	
. Şeb	waste analysis data	in, if available? (40CFR 2)	68.7) -	ber(s), and	Yes	No :	
XIII.	B. If yes, is a copy of to Does generator treat re	i, if available? (40CFR 2 his notification kept for stricted waste(s) on-site	68.7) -	ber(s), and disposal	\times	No :	
	B. If yes, is a copy of to Does generator treat re	h, if available? (40CFR 2 his notification kept for stricted waste(s) on-site (If Yes, fill out land disp	68.7) 5 years?	ber(s), and disposal	Yes	No :]NA
Lan	B. If yes, is a copy of the Does generator treat representations standards? Disposal Restrictions Requirements and Does generator package Does generator package and Does generator pa	this notification kept for stricted waste(s) on-site (If Yes, fill out land dispequirements:	68.7) 5 years? e so that they are below the land cosal restrictions checklist.)	ber(s), and disposal	Yes	No :]NA]
Lan	B. If yes, is a copy of the Does generator treat representations standards? Disposal Restrictions Representations Representat	this notification kept for stricted waste(s) on-site (If Yes, fill out land dispequirements:	5 years? so that they are below the land losal restrictions checklist.) Adequate	ber(s), and disposal	Yes	No No	
Lan	B. If yes, is a copy of the Does generator treat representations standards? Disposal Restrictions Requirements of Disposal Restrictions Requirements of Does generator packages 28-31-4(e)(1)) Does generator label (file	this notification kept for stricted waste(s) on-site (if Yes, fill out land dispequirements: "Ements" "Ewaste in accordance ammable liquid, poison	5 years? so that they are below the land losal restrictions checklist.) Adequate	ber(s), and disposal	Yes	No No	
Pre	B. If yes, is a copy of the Does generator treat representations standards? Disposal Restrictions Requirements of 45 Does generator label (fluor requirements of 45 Does generator mark (compared to the Does generator mark)	chis notification kept for stricted waste(s) on-site (if Yes, fill out land dispending equirements: "Ements" "Emen	5 years? so that they are below the land losal restrictions checklist.) Adequate with DOT requirements? (K.A.R., etc.) each package in accordant	ber(s), and disposal Inade	Yes	No No	NA NA
Pre xiv.	B. If yes, is a copy of the Does generator treat representations standards? Disposal Restrictions Requirements of 45 Does generator package 28-31-4(e)(1)) Does generator label (fluor requirements of 45 Does generator mark (copackage in accordance 28-31-4(e)(3))	chis notification kept for stricted waste(s) on-site (if Yes, fill out land dispending equirements: "ements" "ements" "ements" "ements" "emaste in accordance "emaste liquid, poison of the consignee's or consignee with DOT requirements or the container of 110 or 172.10 o	5 years? so that they are below the land losal restrictions checklist.) Adequate with DOT requirements? (K.A.R., etc.) each package in accordance? (K.A.R., 28-31-4(e)(2)) of's name and address, etc.) on each	ber(s), and disposal Inade	Yes	No No No	NA NA
Pre xiv.	B. If yes, is a copy of the Does generator treat representations standards? Disposal Restrictions Requirements of 45 Does generator package 28-31-4(e)(1)) Does generator label (fluor requirements of 45 Does generator mark (copackage in accordance 28-31-4(e)(3)) A. Does generator maximum accordance 28-31-4(e)(3))	chis notification kept for stricted waste(s) on-site (if Yes, fill out land dispending equirements: "Ements" "Emen	5 years? so that they are below the land losal restrictions checklist.) Adequate With DCT requirements? (K.A.R., etc.) each package in accordance? (K.A.R. 28-31-4(e)(2)) or's name and address, etc.) on each of 40 CFR 172 Subpart D? (K.A.R. 28-31-4)	disposal Inade	Yes	No No No No	NA NA NA
Pre xiv.	B. If yes, is a copy of the Does generator treat representations standards? Disposal Restrictions Requirements of 45 Does generator package 28-31-4(e)(1)) Does generator label (fluor requirements of 45 Does generator mark (copackage in accordance 28-31-4(e)(3)) A. Does generator maximum accordance 28-31-4(e)(3))	chis notification kept for stricted waste(s) on-site (if Yes, fill out land disperated waste in accordance ammable liquid, poison of CFR 172.101 or 172.10 consignee's or consigned with DOT requirements or keach container of 11(s)) Hazardous Waste-Fill found, contact the nearest	5 years? 2 so that they are below the land cosal restrictions checklist.) Adequate With DOT requirements? (KAR., etc.) each package in accordance? (KAR. 28-31-4(e)(2)) or's name and address, etc.) on each of 40 CFR 172 Subpart D? (KAR.) O gallons or less as below?	disposal Inade	Yes	No No No No	NA NA NA

XVII.	Does generator have placards to offer to transpositions of the subpart F? (K.A.R. 28-31-4(e)(4))	orters in accordance with 49 CFR 1	72	Yes	No	NA
XVIII.	Does generator only use a transporter who is pro (K.A.R. 28-31-4(g))	operly registered with the departm	ent?	Yes	No	NA
Pre-	Transport Requirements:	- X Adequate		dequate] NA
Bie	nnial Reports	÷				
XIX.	Has generator submitted a biennial report(s) to h	KDHE? (K.A.R. 28-31-4(f)(2))		Yes	No	NA
	A. If Yes, does generator retain copies for three	e years? (K.A.R. 28-31-4(f)(1)(B))		Yes	No	NA
Bier	nnial Report Requirements:		inad	dequate		
		A Company of the Comp	Carlo San Carlo Ca	*		
Spe	ecial Conditions	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2				
XX.	Has generator received or transported any haza (40 CFR Subpart E)	rdous waste to or from a foreign s	ource?	Yes *	No	
	A. If Yes, has generator filed a Notice with the	Secretary of Health and Environme	ent?	Yes	No	NA
	B. Is waste manifested and signed by a foreign	consignee?	· · · · · · · · · · · · · · · · · · ·	Yes	No	NA
	C. If generator transports wastes out of the coushipment been received?	untry, has confirmation of delivered	1	Yes	No -	(NA
	*See attached letter of explain	anation from facility.				
Spe	ecial Conditions Requirements:	Adequate	ina	dequate] NA ⁻
					آ د د	
Sto	rage Requirements					a
XXI.	Does generator temporarily store waste before t	ransport?	· • •	Yes	No	
	A. For 90 days or less?			Yes	No	NA
	B. For more than 90 days?	•.		Yes	No	NA
	C. If waste is stored in containers:			_		
	 Are containers marked with the words: "F (h)(1)(D)) 	lazardous Waste"? (K.A.R. 28-31-4	(g)(3) or	Yes	(No)	NA.
	 is the accumulation start date marked on (h)(1)(C)) 	each containers? (K.A.R. 28-31-4	(g)(2) or	Yes	(No)	NA
	Are all containers holding hazardous was necessary to add or remove waste? (K.A.	.R. 28-31-4(g)(1) or (h)(1)(B))		Yes	No	NA
	 Does generator conduct weekly inspection and/or deterioration caused by corrosion 	ons of containers for signs of leaka or other factors? (K.A.R. 28-31-4)	ige k))	Yes	No	NA
	 a. If Yes, are these inspections docume inspection, full name of inspector, no nature of remedial actions? (K.A.R. 2 	stations of observations, and date		Yes	No	NA

				et) from the facility's property line? (EPA Generator and T/S/1-31-4(g)(1))	least 15 meta D Only) (K.A.F	rs (50 ?.	Yes	No	NA
ii a		6.	oti	waste in containers is incompatible with other materials store intainers separated from the other materials by means of a diner means? (K.A.R. 28-31-4(g)(1) or $(h)(1)(B)$)	ed nearby, are like, berm, wal	the I, or	(Va)	N	
		7.	Do	pes generator have any satellite storage areas? (K.A.R. 28-31 /es,	-4(j))		Yes	No No	NA NA
			a.	Is the waste stored in a container at or near the point of ge the control of the operator of the process generating the w	neration and u	under	Yes	No	
			b.	Is the container in good condition and closed except to ad-	d or remove v	aste?	(Yes)	No	
			c.	Is the container marked with the words: "Hazardous Waste		,	Yes	No	
			d.	Is the container marked with the accumulation start date at full?		comes	Yes	No	
			e.	Is the full container moved to the storage area within 3 days	s after it becar	ne full?	Yes	No	1
			(If v	waste(s) is placed in tanks, piles, or surface impoundments or opriate inspection checklist.)		ģ.			
Sto	rage	e Re	quire	ements:	uate		dequate		NA
XXII.				perator's Emergency Preparedness					
				named one employee as emergency coordinator? (K.A.R. 2			Yes	No	
	A.	ls fac	the e	emergency coordinator available to respond to an emergend within a short period of time?	cy by reaching		Yes Yes	No No	
	A. B.	Is factorial	the e cility the e nerg	emergency coordinator available to respond to an emergency within a short period of time? emergency coordinator or his/her designee prepared to respendes (fires, spills, or releases) that arise?	ond to any				
XXIII.	A. B. C.	Is factoring in the second sec	the energethe e	emergency coordinator available to respond to an emergency within a short period of time? emergency coordinator or his/her designee prepared to respencies (fires, spills, or releases) that arise? emergency coordinator familiar with the reporting requirement (h)(2)?	ond to any	the	Yes	No	
XXIII.	A. B. C.	Is factoring the factoring is the factor	the energy	emergency coordinator available to respond to an emergency within a short period of time? emergency coordinator or his/her designee prepared to respendencies (fires, spills, or releases) that arise?	ond to any	the	Yes Yes	No No	
XXIII.	A. B. C.	Is factoring lists and the free scess	the energy	emergency coordinator available to respond to an emergency within a short period of time? emergency coordinator or his/her designee prepared to respencies (fires, spills, or releases) that arise? emergency coordinator familiar with the reporting requirement (h)(2)?	ond to any	the	Yes Yes	No No	
XXIII.	A. B. C.	Is the formula the	the energy the energy the energy ollow ssib	emergency coordinator available to respond to an emergency within a short period of time? emergency coordinator or his/her designee prepared to respencies (fires, spills, or releases) that arise? emergency coordinator familiar with the reporting requirement (h)(2)? wing information posted next to at least one telephone which it in an emergency: (K.A.R. 28-31 4(h)(1)(F))	ond to any onts of K.A.R.	the	Yes Yes Yes	No No No	
XXIII.	A. B. C. is tass	Is the fosces. Na.	the edility the energy the edilov ssibo me a	emergency coordinator available to respond to an emergency within a short period of time? emergency coordinator or his/her designee prepared to respencies (fires, spills, or releases) that arise? emergency coordinator familiar with the reporting requirement (h)(2)? wing information posted next to at least one telephone which it in an emergency: (K.A.R. 28-31 4(h)(1)(F)) and telephone of emergency coordinator?	ond to any onts of K.A.R. on is immediated	the	Yes Yes Yes	No No	, NA
XXIII.	A. B. C. Ista	Is factorized for the factorized	the energy	emergency coordinator available to respond to an emergency within a short period of time? emergency coordinator or his/her designee prepared to respected (fires, spills, or releases) that arise? emergency coordinator familiar with the reporting requirement (h)(2)? wing information posted next to at least one telephone which is in an emergency: (K.A.R. 28-31 (h)(1)(F)) and telephone of emergency coordinator? on of fire extinguishers, fire alarms, or spill control material, if one number of fire department unless the facility has a direct cycle's been trained so that they are familiar with proper wast procedures that are relevant to their responsibilities during the spin of the department of their responsibilities during the procedures that are relevant to their responsibilities during the procedures that are relevant to their responsibilities during the procedures that are relevant to their responsibilities during the spin of the procedures that are relevant to their responsibilities during the spin of the spin of the procedures that are relevant to their responsibilities during the spin of the spin o	ond to any onts of K.A.R. is immediated available?	the	Yes Yes Yes Yes Yes Yes	No No No No	NA
	A. B. C. Ista	Is the factor of	the energy the energy ollows:	emergency coordinator available to respond to an emergency within a short period of time? emergency coordinator or his/her designee prepared to respected (fires, spills, or releases) that arise? emergency coordinator familiar with the reporting requirement (h)(2)? wing information posted next to at least one telephone which is in an emergency: (K.A.R. 28-31 (h)(1)(F)) and telephone of emergency coordinator? on of fire extinguishers, fire alarms, or spill control material, if one number of fire department unless the facility has a direct overlapped to that they are familiar with properties.	ond to any onts of K.A.R. is immediated available?	the	Yes Yes Yes Yes	No No No	NA
XXIV.	A. B. C. Havemope	Is the factor of	the collisty the energy the energy the energy offore and the energy one and the energy on	emergency coordinator available to respond to an emergency within a short period of time? emergency coordinator or his/her designee prepared to respected (fires, spills, or releases) that arise? emergency coordinator familiar with the reporting requirement $A(h)(2)$? wing information posted next to at least one telephone which is in an emergency: (K.A.R. 28-31 $A(h)(1)(F)$) and telephone of emergency coordinator? on of fire extinguishers, fire alarms, or spill control material, if one number of fire department unless the facility has a direct cycle's been trained so that they are familiar with proper wast procedures that are relevant to their responsibilities during in (K.A.R. 28-31-4(h)(1)(G))	ond to any onts of K.A.R. is immediated talarm? te handling and	the	Yes Yes Yes Yes Yes Yes Yes	No No No No No	NA NA

(If Kansas generator, stop here.)

					••
Pre	pa	redness and Prevention			
XXV.	if a	appropriate, based upon the nature and quantity of wastes generated and stored at the sility, is the facility equipped with:			e de de gra
	A.	Internal communication or alarm system easily accessible in case of emergency? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(a))	Yes	Ma	
	8.	Telephone or hand-held two-way radio capable of summoning emergency response personnel? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(b))		No	NA
	C.	Portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(c))	Yes	No	NA
	D.	Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(d))	Yes	No 	NA
	E.	Is this equipment (A-C above) tested and maintained to assure its proper operation? (K.A.R. 28-31-4(g)(4)/40 CFR 265.33)	Yes Yes	No No	NA NA
VV /I	Dar		2.7		
ΑΛ VI.	per	es a check of the facility show sufficient aisle space to allow unobstructed movement of sonnel and equipment? (K.A.R. 28-31-4(g)(4)/40 CFR 265.35)	Yes	No	NA .
XXVII.	lf ap arra	opropriate for the type(s) of waste handled, has the owner/operator made the following			
	A.	Familiarized the local emergency authorities with the facility, wastes handled, entrances and exits? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(1))			
A market specimen as a second	B.	Designated one authority whore one or many will	Yes	No	NA
		3 to 3 to 4(g)(4)/40 OFH 265.37(a)(2))	Yes	No	NA
	C.	Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(3))		1 165	
.	D.∵ I	Familiarized local hospitals with the properties at	Yes	No	NA
e.		of injuries which could result from fires, explosions, or releases at the facility? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(4))	Yes	No	NA
XXVIII. I	n ca	ses where local authorities decline to enter into such arrangements, is the refusal			
	ente	red in the operating record? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(b))	Yes	No	NA
			** - 1		
Prepa	recir	ess and Prevention Requirements: Adequate Ina	dequate		VA.
					
Perso	חחכ	el Training			

(1	CA.	he owner/operator establishèd a hazardous waste management training program?	Yes	No	
A	. Is	the program directed by a person trained in hazardous waste management?	Yes	No	
В	•	re new personnel trained within six months after their employment? 0 CFR 265.16(b))	Yes	No	
	(-)	re new employees supervised until training is completed? 0 CFR 265.16(b))	Yes	No	
D	. A! (4	ter initial training, are employees trained on an annual basis? 0 CFR 265.16(c))	Yes	No	

	E.	Does the facility maintain the following documents a	nd records:			
	1	 Job title and job description for each position rela management? (40 CFR 265.16(d)(1) & (2)) 	ted to hazardous waste		Yes	No
	2	 Description of type and amount of training to be g (40 CFR 265.16(d)(3)) 	liven each person?		Yes	No
	3	. Records of training given to facility personnel? (4	0 CFR 265.16(d)(4))		Yes	No
Per	sonne	ol Training Requirements:	Adequate	☐ Ina	dequate	
Coi	nting	gency Plan	**		2000 2000	
XX.	Doe	s the facility have a contingency plan? (K.A.R. 28-31-	4(a)(4)/40 CFR 265 Subn	art D)	Yes	No
. 9	If ye	S,				
	ıı ye A. ∃	s, Does the plan list the names(s), home address, and pemergency coordinator(s) in the order in which they (40 CFR 265.52(d))	phone numbers of design	ated	Yes	No
	A.	s, Does the plan list the names(s), home address, and person the plan list the names(s), home address, and person the property in which they	phone numbers of design should be contacted?	ated	Yes	
	A. B. C.	S, Does the plan list the names(s), home address, and pemergency coordinator(s) in the order in which they (40 CFR 265.52(d))	phone numbers of design should be contacted? (40 CFR 265.55)	ated	Yes	No
	A. B. C. D.	Does the plan list the names(s), home address, and pemergency coordinator(s) in the order in which they (40 CFR 265.52(d)) Is an emergency coordinator available at all times? (Does the plan describe emergency actions facility pe	phone numbers of design should be contacted? 40 CFR 265.55) ersonnel must take to resp 0 CFR 265.52(a))	ated	Yes Yes	No No
	A. B. C. D. E.	Does the plan list the names(s), home address, and pemergency coordinator(s) in the order in which they (40 CFR 265.52(d)) Is an emergency coordinator available at all times? (Does the plan describe emergency actions facility pefires, explosions, or releases of hazardous waste? (40 Does the plan describe arrangements made with emergency actions facility per fires, explosions, or releases of hazardous waste?	phone numbers of design should be contacted? (40 CFR 265.55) Proposed must take to response 265.52(a)) Pergency response agencies at the facility, its locations are sent at the facility, its locations.	ated cond to	Yes Yes Yes	No No
	A. B. C.	Does the plan list the names(s), home address, and pemergency coordinator(s) in the order in which they (40 CFR 265.52(d)) Is an emergency coordinator available at all times? (Does the plan describe emergency actions facility pefires, explosions, or releases of hazardous waste? (40 CFR 265.52(c)) Does the plan describe arrangements made with eme(40 CFR 265.52(c)) Does the plan include a list of all emergency equipments by the plan include a list of all emergency equipments and a brown on the list, and a brown of the list and a brown of the list, and a brown of the list, and a brown of the list and a brown of the list, and a brown of the list and a brown of the list and a brown of the list.	phone numbers of design should be contacted? (40 CFR 265.55) ersonnel must take to response agencies at the facility, its location of its capabilities.	ated cond to es? on, a es?	Yes Yes Yes Yes	No No No

(if EPA generator, stop here.)

___ Adequate

☐ Inadequate

Contingency Plan Requirements:

Tra	ınsp	orter Requi	rements					
XXXI.	Doe If ye	es this facility tranes,	nsport hazardous was	te?	· · · · · · · · · · · · · · · · · · ·		Yes	No
	A.	Are they register 28-31-6 (b))	red as a hazardous wa	ste transporter	n the State of Kan	sas? (K.A.R.	Yes	No
,	В.	Does transporte 263.20(h)?	er comply with the man	ifest requiremer	its of 40 CFR 263.	20 except	Yes	No
	, C.	Does transporte	r retain a copy of the r	nanifest for three	e years? (40 CFR :	263.22(a))	\succ	No
	D.	Does this facility 28-31-4(d)(7)? If yes,	rtransport hazardous v	vaste subject to	the manifest exen	nption of K.A.R.		No)
	1.		sporter record the nan antity of waste shipped cepted in a log or ship		EPA ID number of information, and the information is a second to the information is a second to the information in the information is a second to the information in the information is a second to the information in the information is a second to the information in the information is a second to the information in the information is a second to the information in the information is a second to the information in the information is a second to the information in the information is a second to the information in the information is a second to the information in the information is a second to the information in the information is a second to the information in the information is a second to the information in the information is a second to the information in the information is a second to the information in the information is a second to the information in the information is a second to the information in the inform	of the the date the	Yes	NO (NA)
	2.	Does the trans	sporter carry this recoracility?	rd when transpo	rting the waste to	the	in the second se	\sim
	3.	Does the trans	sporter retain these rec expiration of the agree	orde for a pode	d of three years a	fter the		No NA
Trans	sporte	er Requirements	to execute the second		X Adequate	☐ Ina	dequate	□NA
	ंति		িছে ই ৮ চন স্থান এক্ষান্তৰ ১৮৮		ede en en grand		e satisfaction Les Poursons	
			TWENT HE BETT ONCE THE TO THE BOTH TO STORY	•mmunger synand Tanbase synait			ent disperii Sul il Crestii	Table
		A	dditional info	ormation	and conc	lusions		r. ;
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MIKE HAYDEN
GOVERNOT
JACK D. WALKER, M.D.
Secretary

STATE OF KANSAS



Forbes Field Tope-al-KS 66620-0001 (913: 862-9360

DEPARTMENT OF HEALTH AND ENVIRONMENT

RCRA Compliance Inspection Report T/S/D Facilities Checklist

Α.	<u>General</u>					
,	Date 9-10-91	Time	8:30 AM	EPA ID	No	KSD007246846
	Facility Name	Hydrocarbon Re	ecyclers, Inc.			
# (3.3%)	Street	2549 N. New Yo	ork		<u>,</u>	
	City	Wichita		_, Kansas	Zip_	67219
Security of the second	County	Sedgwick	~	Phone (31	6) 268-	-9490
	Contact	Steve Keiter,	Facility Mana	iger	-V	
	***	Ron Smith, Ter	resa Hansen, S	Siew Kour		
	Other	-				
:3.	Activity at Sit					
- 3.	Treatment		<u> Storage</u>			Gisposal
er de de ser en		=	X Orums	tina na mara	and the second	Incineration
		Bio Treatment		•		* :
	Filtration		<u> </u>	_		Ling Treatment
	Incinerati	<u>en</u>				
	Recycling/	Recovery	X Tank,	Above groun	C	
	Reprocessi	ng	Tank,	Below groun	d	Other (
	X Solvent Re	covery	Other	()		
	Thermal Tr	eatment				
	Volume Red	iustien				
	Waste Oil	,				
	Other ()				

٠.	Comm	nents:		

c.	Wasto Ar	nalysis Plan		<u></u>
.	HASCE AI	idiysis ridii		
265.13		facility maintain a copy of its waste analysis at the facility?	YES	NO
	Α.	If yes, does the plan include:		
Simulation of the second		 Parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters. 	YES	NO
OPBURINGUES.		Test methods which are used to test for these parameters.	YES	NO
		3. Sampling method used to obtain sample.	YES	NO
		 Frequency with which the initial analysis will be reviewed or repeated to ensure the analysis is current. 	YES	NO
		5. For off-site facilities, the waste analyses that generators have agreed to supply.	YES	NO
entranen ganne militar en et de en		5. For off-site facilities, the procedures which are used to inspect and analyze each movement of hazardous waste received to ensure that it		٠
		matches the identity of the waste designated on the manifest.	(3E2)	40
of the second se		· . ·		
asta analysis pla	n require	ements:		
M Agequate	Ell	Inadequate		
<u>.</u>	Jecurit:			
265.14	1. Does	the facility provide either of the following:		
•	a.	A 24-hour surveillance system? (T.V. monitoring or guards).	YES	NO
	ъ. ,	An artificial or natural barrier (fence, fence and cliff combination) and a means to control entry (attendant, T.V. monitoring, locked entrance, controlled roadway access).	(E)	Ю

•	•		
•		2. Does the facility provide warning signs at entrances.	YES NO
·		3. Does the facility consider itself exempt from security requirements?	YES NO
Secur	rity requiremen	ts:	
	[X] Adequate	[] Inadequate [] Not Applicable	
	Ε	General Inspection Requirements	
	265.15	 Does the owner/operator maintain a written schedule at the facility for inspecting: 	
		a. Monitoring equipment	YES NO
•		b. Safety and emergency equipment	YES NO
. <u>*</u>		c. Security devices	YES NO
	in the second se	d. Operating and structural equipment	YES NO
· ·		2. Does the inspection schedule identify the types of problems which are to be looked for during the inspections?	YES NO
•		3. Does the owner/operator maintain an inspection log?	VES) 40
~-		a. If yes, does the log contain the:	

Date and time of inspection

Name of inspector

Notation of observations

Date and nature of repairs or remedial action

inspection requirements:

[X] Inadequate [] Adequate

F. Parsonnel Training

253.15 Does the owner/operator maintain at the facility, the following documents and records:

			b. Description of type and amount of training to be given each person.	YES	NO
			c. Records of training given to facility personnel.	YES	Ю
Person	nel training	req	uirements:		
Ľ)	<pre>Adequate</pre>		[] Inadequate		
	⊕. a.a.a. G.		uirements For Ignitable, Reactive, or Incompatible Wastes		
J/ 2	65.17	1.	Does the facility handle ignitable or reactive wastes?	YES	NO
			a. If yes, is the waste separated and confined from sources of ignition or reaction, sparks, spon- taneous ignition, and radiant heat?	YES	NO
		2.	Are smoking and open flames confined to specially designated locations?	YES	МО
nus sur		3.	Are "No Smoking" signs posted in hazard areas?	YES	NO
		4.	Does a check of these areas show any leakage or corrosion of containers?	(E.S.)	NO
•	•	5.	Does a check of these areas show evidence of heat generation from interaction of incompatible wastes?	YES	NO)
			•		
Ignita	ole, reactiv	e, o	r incompatible waste requirements:		
Ľ	XI ydednare		[] Inadequate		
-	#_	2 - 2 !	paredness and Prayention		
2	65.31	- 	Does an inspection of the facility snow any evidence of fire, explosion, or contamination?	YES	NC
2	55.32	2.	If applicable to the facility, is the facility equipped with:		
			a. Internal communication or alarm system easily accessible in case of emergency?	(15.5)	10
			5. Telephone, hand-held two-way radio capable of summoning emergency response personnel?	(E.)	:40

Job title and job description for each position related to hazardous waste management.

•.					
e.	1	Are portable fire extinguishers, fire control equip- ment, spill control equipment, and decontamination equipment provided?	YES	МО	NA
	4.	Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.?	YES	МО	NA
265.33	5.	Is this equipment (1-4 above) tested and maintained to assure its proper operation?	YES	МО	NA
265.35	6.	Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment?	YES	NO	N/
265.37	7.	If appropriate for the type(s) of waste handled has the owner/operator made arrangements with the local emergency authorities to familiarize them with the layout of facility, properties of wastes handled and associated hazards, places where facility			
The colonial trains of some first of the second	graphiguserati tradic ymae (e).	facility, and possible evacuation routes?	YES	NO	N
	8.	In areas where more than one police and fire department might respond, is there one designated authority?	YES	NO	N
	9.	If appropriate for the type(s) of waste handled does the owner/operator have agreements with State emergency response teams, emergency response contractors, and equipment suppliers?	YES	NO	(1
	19.	if appropriate for the type(s) of waste handled has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility?	(1)) NO)
	4-	In cases where state or local authorities secline to enter into such arrangements, is the refusal entered in the operating record?	YE.	s NO	o (

Preparedness and prevention requirements:

[] Adequate [X] Inadequate

I. Contingency Plan and Emergency Procedures

- 262.53

 1. Is a contingency plan maintained at the facility and have obbies been provided to outside agencies which may be called upon to provide emergency services?
- 262.32 2. Boes the plan describe arrangements made with amergency response personnel?

(5) 30

	3.	Does the plan list the name(s), home address, and phone number(s) of the designated emergency coordinator(s)?	YES	NO
265.55	4.	Is an emergency coordinator available at all times?	YES	NC-
	5.	Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities?	(YES)	NO
	6. .	Does the plan include an evacuation plan for facility personnel?	YES	NO
Contingency plan	and e	mergency procedures requirements:		
		[] Inadequate		
J.	. <u>Man</u>	ifest System, Recordkeeping, and Reporting	•	
265.71	1.	Does the facility receive waste from off-site?	YES	NO
		a. If yes, does the owner/operator sign and date each copy of the manifest and give a signed copy to the transporter?	YES	NO
		b. Does the owner/operator send a signed copy of the manifest to the generator within 30 days of the delivery?	(15)	70°
· · · · · · · · · · · · · · · · · · ·	٠.	c. Does the owner/operator retain a copy of manifest?	(YE5)	МО
ukan salah s	2.	Does the facility receive any waste from a rail or water (bulk shipment) transporter?	r /EE	(0::
	ing of more	a. If yes, is the shipment accompanied by a shipping paper containing the appropriate information?	:E 3	NO (
		 If yes, coes the owner/operator sign and data the shipping paper and provide the transporter with a copy? 	Æ	.:0 (
		2. Does the owner/operator send a signed copy of the shipping paper to the generator within 30 days of the delivery?	YES	NO
		3. Joes the owner/operator retain a copy of the shipping paper?	YES	MO
365.72	3.	Has the facility received any shipments of waste which were inconsistent with the menifest?	(1)	210

•	a.	If yes, was an attempt made to reconcile the discrepancy with the generator and transporter?	YES	МС	NA
£		1. If no, was the Regional Administrator notified?	YES	NO	NA
265.73 4.		the owner/operator keep a written operating record he facility?	YES	МО	
	a.	If yes, does the operating record include:			
		 A description and the quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, and disposal? 	YES	ИО	N.
	• • •	2. The location of each hazardous waste within the facility and the quantity at each location?	YES	NO	Ni
	tur. Kath	3. Records and results of waste analyses?	YES	МО	N,
		4. Reports and details of incidents requiring implementation of the contingency plan?	YES	NO	(N
		5. Records and results of required inspections?	YES	NO	N
en de la companya de La companya de la co	44.4	6. Monitoring, testing, or analytical data?	YES	NO	N
		7. Closure cost estimates (and for disposal facilities, post-closure cost estimates)?	YES	NO	N
265.76 5.	faì	the facility received any waste, which does not under the small generator exclusion, not act panied by a manifest or snipping paper?	fES	(10))
	a.	If yes, was an unmanifested waste report submitted to the Regional Administrator?	YES	MO	(;

. Clasure and Post-Clasure

265.112 1. Does the owner/operator have a written closure plan for the facility?

YES N

a. If yes, does the plan include:

1. A description of how and when the facility will be dissed?

2.	A description of the steps necessary to completely close the facility?	YES	NO .	
3.	An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the facility life?	YES	NO '	
4.	A description of the steps needed to decontaminate facility equipment at the time of closure?	YES	МО	
5.	An estimate of the expected year of closure and a schedule for final closure which includes the total time required to close the facility and the time required for intervening closure activities which allow tracking closure progress?	YES	NO	
If the owner/o	facility is a disposal facility, does the operator have a written post-closure plan?	YES	NO	(N _i
a. If	yes, does the plan include:			
1.	Ground-water monitoring activities and frequencies at which they will be performed?	YES	NO	N
2.	Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment structures where applicable, and the function of the monitoring equipment?	YES	NO	(N

person or office to contact during the postclosure period?

The name, address, and phone number of the

YES NO ()

YES NO !

Closure and post-closure requirements:

265.118

1	==:	nancial Requirements	
265.142	I.	Does the owner/operator have a written estimate of the closure cost?	YES NO
255.143	2.	Has the owner/operator established financial assurance for facility closure and notified the Regional Administrator? (Required after 1-6-82).	(ES) 40
255.144	3.	If the facility is a disposal facility, does the	

the facility?

owner/operator have a written estimate of the annual cost of post-closure monitoring and maintenance of

- 265.145
- 4. Has the owner/operator of the disposal facility established financial assurance for post-closure care and notified the Regional Administrator? (Required after 7-6-82)

YES NO (

- 265.147
- 5. Has the owner/operator obtained liability insurance for sudden occurrences of at least \$1 million with an aggregate of at least \$2 million exclusive of legal defense costs? (Effective 7-15-82).

YES) N

6. If the facility is a disposal facility, has the owner/operator obtained liability insurance for nonsudden and accidental occurrences of at least \$3 million per occurrence with an annual aggregate of at least \$6 million exclusive of legal defense costs? (Effective 7-15-82)

YES NO

Financial requirements:

[X] Adequate

[] Inadequate

M. Management of Containers

- 265.170 1. Ar
- 1. Are containers presently used to store hazardous waste?



- a. If no, do not complete questions 2-5.
- b. If yes, check condition of containers and for evidence of incompatibility of waste with containers.

Condition of Containers:

- 265.173

 2. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste?
- (E5) %
- 265.174
 3. Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leakage and/or deterioration caused by corrosion or other factors?
- (E3) 40

265.176		located at least property line?	holding ignitible t 15 meters (50 f		YE	S. NO N
265.177	5.	materials store	stainers is incomped nearby, in other surface impoundment the other material other device?	nts are the cor	ntainers	.s NO 1
Management of	Contain	ers:				
[X] Adeq	uate	[] Inadequate	[] Not Applic	able		
Note:	Determ	ine if owner/ope	erator claims any	information conf	fidential.	·
Note:	Fill o	_	necklists for spec	-ific facility t	ypes	en e esperante de la companya de la
Addition		rmation and CONCL		·	•	
Add 10 jo.						
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Form:	TSD 4/	82				



Kansas Department of Health and Environment Bureau of Waste Management Forbes Field, Topeka, Kansas 66620 (913) 296-1600

Tank Inspection Checklist

Owne	er Info	rmation							
Date	9-10-9	1	EPA I.I	D. No	KSD007246846			 	
Facility Na	.me	Hydrocarbon F	Recyclers, I	nc.					
Street		2549 N. New \							
City		Wichita			, Kansas	Zip	67219	· · · · · ·	
Tank	Inforn					e ne si e co			
	•	Tank #1		Tank #2		Tank #3			 1
Description	on:	SEE ATTACHE	D SHEET.						
Capacity:						·			
Substance	e Stored:	-							
Waste Co	de:								
Location:									
Exist	ing Ta	ınk Systen	n(s)		**************************************				# # #
	**************************************			us Waste"? (K.A	LR. 28-31-4)		Yes	No	
w	is the tank(s) labeled with the words "Hazardous Waste"? (K.A.R. 28-31-4) If the tank(s) is not covered, does it have at least 2 feet (60 cm) of freeboard unless equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would provide? (40 CFR 265.192(c))							Ño	NA
	Is the tank(s) equipped with a waste-feed cutoff or bypass system(s) as required by 40 CFR 265.192(b and d)?							No	
IV. A	re daily ins	pections made of	all systems pert	inent to the pro	per operation of the	e tank?	Yes	No	
A	Discha	rge and cutoff sys	tems?				Yes	No	N/
В	. Tank le	evel and freeboard	?				Yes	No	(N/
	. Draina	ge systems?					Yes	No	(N

	D .	Abo	ve-ground portions for corrosion?	(Yes)	No	NA
	E.	Mor	nitoring and leak detection equipment?	Yes	No	NA
	F.	Sec	ondary containment?	Yes	No	NA
٧.	Are	these	inspections documented in a log?	Yes	No	
٠.	A.	in th	ne case of a permitted T/S/D facility, do they follow the inspection schedule outlined neir permit?	Yes	No	NA
VI.	Has was	the tates or	ank(s) been used to treat or store wastes substantially different from previous have substantially different treatment processes been used in the tank(s)?	Yes	No	
	A.	impi ope trea	s, were waste analyses and trial treatment or storage tests conducted prior to ementing the proposed changes and is all the data kept on file in the facility rating record or was written, documented information on similar storage or the transfer of the proposed changes and documentation kept on file in the facility operating record?	Yes	No	NA
VII.			exception of emergency situations, have ignitable or reactive wastes been placed in by the facility?	Yes	No	NA
4,7	A .	If ye	s, has the facility insured the safety of the operation by one or both of the following hods (40 CFR 265.98)?	. 8		
e Mari Limer		1.	Was the waste treated immediately before or after being placed in the tank(s) so that it is no longer ignitable or reactive and such treatment is done in compliance with the safety requirements of 40 CFR 265.15(b)?	Yes	No	NA
:		2.	Was the waste stored or treated under protected conditions eliminating the possibility of ignition or reaction?	Yes	No	NA
VIII.			ed tank(s) is used to treat or store ignitable or reactive wastes, does the facility NFPA buffer zone requirements? (40 CFR 265.198(b))	Yes	No	NA
IX.	tank		atible waste materials are placed in the same tank(s) or are put in a contaminated this done under completely controlled and safe conditions as specified in 40 CFR	Yes	No	NA
x			(s) has cathodic protection systems, is it inspected according to the following (40 CFR 265.195(b))?	Yes	No	NA
	A	Was	proper operation confirmed within 6 months of installation and annually thereafter?	Yes	No	(NA)
	B.	Are i	induced current sources inspected/tested at least bimonthly?	Yes	No	NA)
	C.	Are	records maintained of these inspections?	Yes	No	(NA)
XI.	Was	the ta	ank(s) used for the management of hazardous waste prior to July 14, 1986?	Yes	No	NA
	A.	If ye	s, does the tank system(s) have secondary containment?	Yes	No	NA
	₿.	If no by a	has a written assessment that attests to the integrity of the tank(s) been prepared n independent registered engineer?	Yes	No	NA
If yes,	did th	e ass 1.	essment include the following: Design standards according to which the tank and ancillary equipment were constructed?	Yes	No	

-		2.	Existing corrosion protection measures?	Yes	No	(NA)
		3.	Hazardous characteristics of the waste to be handled?	Yes	No	
		4.	Documented age of the tank system (if available) or estimate of the age?	Yes	No	
		5.	Results of a leak test, internal inspection, or other tank integrity examination? (If the results of this test show the tank to be leaking or unfit for use, the owner must implement 40 CFR 265.196.)	Yes	No	
		6.	is the leak test conducted annually by an independent, qualified, registered engineer? (40 CFR 265.193(i)(1) and (2))	Yes	No	
		7.	Are records of the assessment results maintained on file at the facility?	Yes	No	
chedu	Jie da	te who	en secondary containment is required per schedule in 40 CFR 265.193(a) (1 throug	jh 5)		
			L		Inadeo	nete l
Exis	ting 7	ank :	System(s) XI Adequate			<u>jane</u>
				Fig.		

Ne	νT	anl	k System(s)			Ē
l.	Is the	e tank edule i	system(s) required to have secondary containment (new system or according to n 40 CFR 265.193(a)(1 through 5)?	Yes	No	
	A.	If yes	s, has the owner or operator requested a variance from the secondary ainment? (40 CFR 265.193(g and h)	Yes	No	NA
	В.		s, does the secondary containment meet the following minimum requirements? (40 265.193(b and c))		
·		1.	Constructed of or lined with materials compatible with the waste and of sufficient strength?	Yes	No.	NA
Ţ		2.	Placed on a structurally adequate foundation?	Yes	No	NA
		3.	Provided with a leak detection system capable of detecting releases within 24 hours?	Yes	No	NA
		4.	Adequately sicped or designed and operated to drain and remove liquids from leaks, spills or precipitation?	Yes	No	NA
	C.		es, does the secondary containment include one of the following: (40 CFR 193(d))			
		1.	External liner?	Yes	No) NA
	·	2.	Vault?	Yes	No.	NA

Double-wailed tank?

Equivalent device approved by the Secretary?

Yes

Yes

·No

• ;	D.		s, does the secondary containment satisfy the following requirements: (40 CFR 193(e))			•
Ear Evi	torna	l l ine	es and Vaults			
FUI EX	(C) PA	1.	Adequate capacity to contain 100% of the largest tank within its boundary?	(Yes)	No	NA
		2.	Designed or operated to prevent infiltration of precipitation into the containment system unless it has adequate capacity to contain a 25 year, 24 hour rain event?	Yes	No	NA
		3.	Free of cracks or gaps?	Yes	No	NA
		4.	Completely surrounds the tank and surrounding earth likely to be exposed to waste if a release occurs?	(Yes)	No	NA
For Va	ults	1.	Constructed with chemical-resistant water stops at all joints?	Yes	No	NA
		2.	Provided with an impermeable coating or lining over the concrete?	(Yes)	No	NA
*		· 3.	Protected against vapor ignition, if required due to the waste characteristics?	Yes	No	NA
*		4.	Provided with an exterior moisture barrier?	Yes	No	NA
For Do	ouble	-Wall 1.	led Tanks Designed as an integral structure for containment of releases?	Yes	No	NA)
		2.	If metal, is it protected from corrosion, if metal?	Yes	No	(NA
:* ·		3.	Provided with a built-in continous leak detection system capable of detecting releases within 24 hours?	Yes	No	(NA)
XIII.	ls a	ncilla	ry equipment provided with adequate secondary containment? (40 CFR 265-193(f))	Yes	No	NA
XIV.	Has dete	the termin	ank system or secondary containment system had a leak or spill or was it ed to be unfit for use?	Yes	No	NA
	A.	if ye	es, was it immediately removed from service and appropriate follow-up actions en as required by 40 CFR 265.196 (b through e)?	Yes	No	· (NA)
XV.	witi	h 40 (ive repair has been conducted on the tank system was it recertified in accordance (CFR 270.11(d) and such certification submitted to the Secretary within 7 days? (40196(f))	Yes	No	(NA
_			retem Requirements Adequate		Inadi	equzte
Ne	w Tai	nk Sy	rstem Requirements Adequate			
Com	ments	:				
		J			, , , , , , , , , , , , , , , , , , , 	4.8

Hazardous Waste Tank Storage (S02) Service¹

VESSEL	CAPACITY - WORK (gal)	CAPACITY - MAX (gai)	LOCATION
V-1	7,181	7,363	Process Area
V-2	7,084	7,084	Process Area
V-3	7,181	7,363	Process Area
V-4	7,181	7,363	Process Area
v.\$	20,895	20,895	Process Area
V-6	20,895	20,895	Process Area
V-7	7,181	7,363	Process Area
V-\$. 7,181	7,363	Process Ares
V-9	5,078	· 5,078	Building D
V-10	5,078	5,078	Building D
V-11	5,078	5,078	Building D
V-12	5,078	\$,078	Building D
V-13	5,078	5,078	Building D
V-14	5,078	5,078	Building D
V-15A	2,659	2,659	Building D
V-15B	2,659	2,659	Building D
V-15C	2,659	2,659	Building D
V-15D	2,659	2,659	Building D
V-16	9,028	9,028	Building D
V-17	522	522	Process Area
V-18	489	489	Building D
V-26	1,129	1,155	Process Area
Y-29	90	90	Building D
V-30	90	90	Building D
V-31 ·	115	115	Building D
V-32	115	115	Building D
V-34	539	539	Process Area
TOTAL	138,000	138,936	N/A

Attachment 2

SOP No. FROOZA

Attachment No. 1

JOINT RCRA OVERVIEW INSPECTION CHECKLIST

Date of Inspection:	7/28	192			
Facility Name/Location	Aydroca	bon 1	Reonal	ers, Inc.	·
	2549				
	Wichit	a, k	<u> </u>	67219	Management and decreased
Facility Phone Number:		_			
Facility EPA/State ID N					
			_		
Facility Cassification:	Gener	ator I	☐ Trans	sporter TSD acil	lity
	П	Resourc	e Recove	ery Facility	
Participants:	Nan	ne	_	Title	
Facility:	Steve K	este	Fac	ett manager	·
				, 0	
	Ron Ro	berson		/	.
State:	Teresa	Hanse	n t	hviron mental Te	charcien
	Spew Ko	our	E	nvironmental	Engineer
EPA:	Kris G	oschen	E	Environmental	Scientist
		1			
INSPECTION EVALUATION (S	= Satisfacto	ry, U =	Unsatis	factory)	
	1	Re	emarks/s	uggestions for impr	ovement
S Preparation for Inspec	tion		Sen 6		
					T
W Entry Procedures					
S Facility Information V	erification				
S Records Check					
Site Inspection					
S Documentation					
2 Justing Joshpigus					
> Inspect for recimique					
Comments:					
· .	_				

SEC	TION A - Preparation for Inspection	l YES	NO 1	N/A
1	Reviewed following facility information/files		-	
	a. Notification	/		
	b. Part A Applications and/or permit			
	c. Previous inspection reports			
	d. Letters, correspondence, misc.			
2	Had coordinated with EPA/other state personnel		:	
7	Use knowledgeable of regulations			
7	Had performed previous RCRA inspections			
7.	Was overall familiar with facility	1		
5	Had inspected this facility previously	1		
7.	Had contacted facility to provide notification of inspection			
	HOLLI ICALION OF INSPECTION			

SECTION B - Inspection Tools

4	Adequate individual safety equipment		
1.	Adequate individual safety equipment	-39	
2.	Brought camera and film		
3	Prought conv of regulations		
7	Brought copies of appropriate checklists		
7.	Drought files on facility		
5.	Brought files on facility		
6.	Brought adequate writing material		
7.	Field NOV (if applicable)		

Comments:

Comments:

2. She did not have extra film available after she ran I provided her with film so she could complete her inspection

SECTION C - Entry Procedures

1. Did inspector attempt to contact designated official/representative?		·	
2. If designated official/representative was not available, did inspector determine that spokes-			~
mamman war authorized to speak IDE Idellies:			
3. Was facility provided prior notification of			
inspection by inspector? 4. If entry was denied, did inspector follow			~
actablished state procedure:			
5. Did inspector present his credentials?			
6. Did inspector explain authority for inspection? 7. Did inspector explain reason for inspection?			
8. Did inspector explain facility s			
fidentiality rights?	 	/	
9. Did inspector explain how the inspection			.
would proceed?		L	

anthority, Sect. 3007 RCRA, to Comments:

2-2

SECTION D - Facility Information Verification	YES	NO_	N/A
1. Obtained information on processes/			
operations at facility. 2. Identified and quantified all wastes generated.			
3. Wastes were properly classified. 4. Method of determining hazardous waste	V		
was esabl shed. 5. Methods of handling and disposal of wastes			
are determined. 6. Information contained in notification, Part A			
application and/or permit was verified Comments:			

SECTION E - Records Check

1. Did the inspector inspect and evaluate the			
following records in detail:			
a. Manifests			
b. Inspection records			
c. Operating records			*
d Waste Analyses			
e. Personnel Training records			
f. Annual reports			
2. Did inspector inspect and evaluate the following plans/programs to determine compliance with requirements?			
a. Preparedness and prevention	 	 	1
b. Contingency plan		-	
c. Groundwater Monitoring	4	1	
- Closuro/post-closure		+	-
e. Financial assurance/liability			
3. Did inspector utilize appropriate checklists?			
3. Did inspector utilize appropriate		1	
4. Did inspector obtain photocopies?		<u></u>	

\$ 1. Waste Analysis Plan was not evaluated in detail for TCLP & Support BB
requirements.

SECTION F - Site Inspection

1. Did inspector visually inspect and fully evaluate each area of the facility were hazardous	
wastes are generated or managed? 2. Were photographs taken to document	
deficiencies or violations? 3. Did inspector obtain or make sketch of	
facility?	

Comments:

SECTION G - Documentation of Inspection	1 YES / N	0 N/A
1. Did inspector take adequate notes?		
2. Did inspector obtain photocopies of specific records, reports, etc. to document		
deficiencies? 3		
to document results of inspection? 4. Did inspector take photographs to document		
observations? Comments:		

SECTION H - Outbriefing

1. Did inspector explain deficiencies/ violations to responsible official?			
2. Was a Notice of Violation issued: 3. Were all deficient items noted?			
b. Were regulatory cites correct? 3 Did inspector require facility to take		12	5
4. Did inspector adequately address any questions			
from facility? 5. Were receipts provided for materials received			v
on-site?	<u></u>		

Comments: 3. Overpack leaking containers

SECTION I - Inspection Technique	1	
 Did inspector avoid leading questions? Did inspector use probing questions to 		
obtain information?		
5. Were all regulatory requirements reviewed	V*	
and evaluated? 6. Did inspector effectively determine facility's	V	
Compliance status? Comments:		

)	Attachment 3
	D. Briglana -
	D Building -
	Oakite parts cleanor- Product.
	Oakite parts cleanor-product. 3 druns labeled non-haz waste.
	3- Sm. overpacks- storage labeled non-haz. Waste.
	Cabella non-haz. Waste.
2	1- Salvage
	- Salvage
41 -	RO Wasto Morcury Metallic ORM-B
7	RQ Wasto Mercury Metallic ORM-B 3-12-91 Accumulation start date. Sgallon container
toe7	Sgallon container
2	12001 Install To Day Bo 1/ 10
1	Waste Indicade Dry-Brown & Non-ray.
-	1 - RQ Waste Mercury Metallic (5 gaelon)
	no date
	1 0 - Waste
	1 - RQ Mercury Metallic - accum. date 4/92 only (no day)
	accum. date 4/92 only
	(No day)

U151 Code no disposal ontlet

Tank Stonageprocessing aua - Waste Hro seum washer rinsates. - #2 Diesel. cleaned and of overy 8 Lyt Kiln yuel floor ony-wed for

Debris from Blog - to Love Mat. Building C Cracks in floor C701- 3rd. deun E. Oryptalizing at bottom. No 4th. Crystalization 900-1000 dums 701- Serverly dented I laking

-d 92037 NWR #. 6/26/92 # Loosp box 1 5204 Non Weders & Lugers (1 m Egreen 01. greek Inc. 175891781 20028 26/11/5 and demiden no long.

- Leplace up goe Douday. i veloun textimon - De nation 10 00 # to insing of mo station no motion 2018. 2100 Line Sannoy 2000 165-E

Blog. D. OSHA legal prod. to

Product dams labeled non-haz.

Waste. — Mercury Metallic > 142. storage.

Need to submit documentation
to topeka on attempt to find
a disposal facility. Cracking of floor - Date of crepair *Comment - as long on. ther that remain interm status.) Tank Orea to be closed Aug. 3 through 7 to be re-scaled where needed. traigh area - 2 drums uj Crystalization leaving or spillage

Bldg. B floor cracked Severely dented dum. - perc. worstes Ron's training > lyn older ago CP Changes. On Emergency Coordinator. — When will: the Changes be submitted. W Part B. > John John Specific cross reference from new man jest and old wantest ELDR. Attachment 4

POLLUTION PREVENTION WORKSHEET

1. Do the manifests used by the facility certify that a pollution prevention program is in place (specific wording listed under 40 CFR 262 Appendix): Yes No Further Explanation:
2. Does the facility biennial report contain a description of pollution prevention efforts and achievements (specific requirements listed under 40 CFR 262.41 a.6 & a.7, 264.75 h & i, and 265.75 h & i): Yes No Further Explanation:
3. If facility is a permitted TSD, does the operating record contain an annual certification that a pollution prevention program is in place (specific wording listed under 40 CFR 264.73 b.9): YesNoN/A
4. Does the facility have a written pollution prevention program: Yes No Further Explanation:
IF YES, ATTEMPT TO OBTAIN A PHOTOCOPY; COPY ATTACHED: YES NO
5. If the facilty does not have a written pollution prevention program, does the facility have an unwritten program that can be verbally described: Yes No N/A Further Explanation:
SUMMARY OF VERBAL DESCRIPTION: Schreed of grind all wester sallets + plastics for garesy recovery. Use hurrable obsorbers.
NOTE: THERE IS NO REQUIREMENT FOR A POLLUTION PREVENTION PROGRAM TO BE WRITTEN, AND SPECIFIC REGULATORY CRITERIA HAVE NOT BEEN ESTABLISHED FOR POLLUTION PREVENTION PROGRAMS. THE INSPECTOR SHOULD NOT CONDUCT A TECHNICAL REVIEW OF WRITTEN OR VERBAL PLANS.
6. If the facility has a written or verbal pollution prevention program, is this program actually being implemented: Yes No Further Explanation:
7. Is facility complying with any additional pollution prevention requirements established by a permit or enforcement action: Yes No N/A Further Explanation:
8. ENCOURAGE THE FACILITY TO BEGIN/CONTINUE POLLUTION PREVENTION EFFORTS: Accomplished
9. PROVIDE THE FACILITY WITH THE FOLLOWING INFORMATION:
Appropriate Fact Sheet(s): Accomplished (Multimedia plus industry specific if appropriate) State Contact Information: Accomplished Clearinghouse Information: Accomplished



Department of Health and Environment

Azzie Young, Ph.D., Secretary

September 15, 1992

Reply to:

Waste Codes

F006

South Central District Office 1919 N. Amidon, Suite 130 Wichita, Kansas 67203 Phone: (316) 838-1071 Fax: (316) 838-0042

Steve Keiter

Hydrocarbon Recyclers, Inc.
2549 N. New York
Wichita, Kansas 67219

Re: Hazardous Waste Compliance Inspection EPA Identification Number: KSD007246846

Wastes Generated

protective clothing and sampling

Dear Mr. Keiter:

equipment

On July 28, 1992 your facility was inspected to determine compliance with state hazardous waste regulations.

The inspection revealed that your facility generates the following hazardous wastes as defined by K.A.R. 28-31-3:

F001/F002 Chlorinated solvents 1. F002 Tetrachloroethylene contaminated 2. wastes (carbon, cartridge filters, water) D001/D007/D008 Flammable waste water 3. D001/F003/F005 Solvents and solvent/paint mixtures 4. Oxidizers (Class 1 and 2 only) D001 5. D004/D005/D006/ Nonblendable wastes D007/D008/D009/ D010/D011 D001/F001/F002/ Blendable wastes for kiln fuel 7. F003/F005/U-listed/ D004 to D011 D002/D007 Corrosives 8. D002/D007/D001/F001/ Contaminated floor sweepings,

The quantity of hazardous waste generated is more than 1000 kilograms (approximately 2200 pounds) per month. Therefore, your facility is considered an EPA generator and is regulated under K.A.R. 28-31-4 excluding 28-31-4(h) and (m). Your facility is also an interim status storage, treatment or disposal (T/S/D) facility and is subject to K.A.R. 28-31-8. In addition your facility is the marketer of hazardous waste fuels and is subject to 40CFR Part 266 as adopted by K.A.R. 28-31-8(b).

Hydrocarbon Recyclers, Inc. September 15, 1992 Page 2

The inspection identified the following items not in compliance with state regulations concerning generators of hazardous waste:

- 1. You have not submitted the changes in your emergency coordinators as required by K.A.R. 28-31-4(g).
- 2. You did not have documentation of training within the past year for Ron Robertson as required by K.A.R. 28-31-4(g). However, Mr. Robertson's responsibilities include conducting the annual training. It is recommended that Mr. Robertson document his attendance of these training sessions.
- 3. The following 55-gallon drums were not in good condition as required by K.A.R. 28-31-4(g).

Bldg. B. - 1 severely dented drum

Bldg. C. - 3 severely dented drums located in aisles

C707, C715, C727

1 leaking drum located in aisle C727

2 drums with that had crystallized on the
bottom rim located in aisle C701

These violations must be corrected by October 9, 1992. Notify me in writing addressing each violation and the action you have taken to correct each one.

Your facility is storing mercury wastes (U151), a restricted hazardous waste, for greater than one year. The land disposal restriction effective date was May 6, 1992. You will need to dispose of this waste before May 6, 1993. If you are unable to find a disposal method for this waste you will be required to demonstrate and document your purposes for storing these waste for greater than one year past the effective date as required by 40 CFR 268.50.

Observations made during the inspection revealed cracks were visible in the secondary containment of the storage areas of Building C and D. These areas are currently under repairs. The repairs will need to be completed before your permit can be approved.

In the storage area, I found that the hazardous waste label on several drums in Building C were not clearly visible. It is recommended that the drums be placed so the hazardous waste label and the accumulation start date can be easily seen.

Hydrocarbon Recyclers, Inc. September 15, 1992 Page 3

Also, there were drums located in the maintenance area that were marked with a non-hazardous waste label. The drums contained product (oakite) and others were used for storage. It is recommended that the drums be identified in another manner, not as a waste.

While reviewing manifests for waste that you have received from Van Waters and Rogers, I found that the Land Disposal Restriction (LDR) notice from the original generator was attached. It does not clearly identify the new manifest number. It is recommended that a specific reference be made for these manifests.

Your cooperation with the hazardous waste management program is appreciated. If you have questions concerning the inspection, please call me at (316) 838-1071.

Sincerely,

Teresa Hansen

Inspections and Enforcement Section

Bureau of Waste Management

TH:ss

pc: Mike Tate, BWM, Topeka

John Mitchell, BWM, Topeka

Kris Goschen, EPA, Region VII

SCD-File



Kansas Department of Health and Environment Bureau of Air and Waste Management Forbes Field, Topeka, Kansas 66620

Hazardous Waste Generator/Transporter Compliance Inspection Report

General				
		Time	9:00 AM	Date 7-28-92
Facility Name Hydrocarbo	n Recyclers, Inc.		EPA ID No.	KSD007246846
Street 2549 N. Ne	w York	City	<i>l</i> ichita	, KS Z ip67219
Mailing Address (If different than	n above)			
County Sedgwick	·		Phone (3:	16) 268-9490
Contact(s) Steve Keiter	, Facility Manager		<u> </u>	
Ron Robertson	n, Facility Safety and C	ompliance C	fficer	
inspector(s)	en, Siew Kour, Kris Gosc	<u>hen EPA Re</u>	gion VII	
Type of Business Commerce				
Has the company declared any if yes, explain.	information/processes as trade	secrets (KSA	65-3447)?	Yes No
	:			
ing sing wases	s Generated			
(List hazardous wastes first)				
Waste:	Chlorinated Solvents			proethylene sted wastes
If waste is hazardous, give HW ID Number:	F001/F002		F002	TITLETS
Amount generated per month:				•
Amount presently in storage:				
Accumulation time:				
Present disposal method:	HRI, Tulsa, OK and HRI, San Antonio, TX		Rollins, Ross, Gra	Deerpark, TX and fton OH

Waste:	Flammable Wastewater	Solvent and paint solvent mixture (kiln fuel)
If waste is hazardous, give HW ID Number:	D001/D007/D008	D001/F003/F005
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal method:	Gibralter, TX Incineration Deep Well Injection	Systech, Fredonia, KS

Waste:	Oxidizers	Non-blendable Wastes
If waste is hazardous, give HW ID Number:	D001	D004 - D011
Amount generated per month:	1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	
Amount presently in storage:		
Accumulation time:		
Present disposal method:	Incineration - Rollins or Ensco. W/ Listed codes	USPCI, Lone Mountain, OK. Incineration - Rollins or Ensco.

Waste:	Blendable Wastes for Kiln Fuel	Corrosives
If waste is hazardous, give HW ID Number:	D001/F001/F002/F003/F005 Approved U wastes, D004 - D011 D18-43	D002/D007
Amount generated per month:	·	
Amount presently in storage:		
Accumulation time:		
Present disposal method:	Systech, Fredonia, KS and Heartland Cement, Independence	USPCI, Lone Mountain, OK.

Vaste:	Non-hazardous wastewat	er Use	ed Oil			
waste is hazardous, live HW ID Number:	none	no	one			
Amount generated per month:						
Amount presently in storage:						
Accumulation time:						
Present disposal method:	Gibralter for Deep Well USPCI, Lone Mountain, (Water treatment plant		stech, Fredonia	, KS.	13 X	
General Require				$\overline{\Omega}$	No	
. Has the facility evaluated a (KAR 28-31-4(b))	all potentially hazardous waste(s) to determine if it is r	azardous?	Yes/	, NO	
A. If waste(s) was tested	, was the analysis conducted b	y a laboratory certified	by KDHE?	Yes	No	NA
(KAR 28-31-4(b)(3)(A)) , are the results kept for three y	ears? (KAR 28-31-4(f)(1)(C))?	Yes	No	NA
. K hazardoue waeta(e) ie d	isposed of via the sanitary sewon permission been obtained from	er to a Publicly Owned	Treatment	Yes	No (NA)
been obtained? (KAR 28-		y landfill, has a dispos	al authorization	Yes	No	(NA)
A. If yes, list the authoriz						
IV. Facility size classification ☐ Not a Generator ☐ T/S/D Facility	Small Qty. Generator] Kansas Generator] HW Marketer	EPA Generat Used oil Burn		keter	
Hazardous Waste Determin	ation Requirements:	Adequate	☐ Inadequate			
Notification Bed	uirements (GGR)					
***************************************			AR 28-31-4(c))	(Yes)	No	NA
	OHE and obtained an EPA Iden curate? (KAR 28-31-4(c)(1))	uncation number: (Yes	No	NA
VI. Is current notification acc A. Is this facility market	ing (selling) hazardous waste a	s a fuel?		Yes	No	NA
	ing (selling) used oil as a fuel?			Yes	(No)	NA
(If ves. to either questi	on A or B, complete Used Oil F	uel Marketers/Blender	s Checklist.)	•		
	g hazardous waste as a fuel?			Yes	®	NA
D. Is this facility burning				Yes	(No)	NA
Notification Requirements	: X	Adequate	☐ Inadequate			A

(If small quantity generator, stop here.)

IV	la	nif	ests (GMR)	*		
VII.	is 26	a co 32.20	entractual agreement used in place of manifesting? (KAR 28-31-4(d)(7)(A-C)/40 CFR	Yes	(S))
	A:	lf y	es, does the contractural agreement include the type of waste and frequency of ipments?	Yes	No	
		un	es, is the vehicle used to transport the waste owned and operated by the reclaimer of a waste?	Yes	No	
		~ 9	res, is a copy of the agreement kept for a period of three years after termination of reement?	Yes	No	NA
VIII.	ls 28	a cu -31-	rrent manifest showing revision date and burden disclosure statement used? (KAR 4(d)/40 CFR 262.20)			
•			res, does manifest(s) include:	(Yes)	No	NA
		1.	。	Vas	No	 110
		2.	Number of pages?	(Yes) (Yes)	No	NA
100	garan ar	3.	Generator's name and mailing address?	Yes		77
		4.	Generator's phone number?	Yes Company	No No	1
		5.	Transporter 1 Name?	Yes	No	. अङ्गा
	. ,	6.	Transporter 1 EPA Identification Number?	Yes	No	
		7.	Transporter 2 Name?	Yes	No	NA
-4 2 (2	4	8.	Transporter 2 EPA Identification Number?	Yes	No	
3.5	1. 1 th.	9.	Name and site address of designated facility?	Yes	No	NA
		10.	Designated facility's EPA Identification Number?	Yes	No No	
			Waste Description (DOT shipping name, hazard class, and Identification Number)?	Yes	_	
	,		Number and type of containers?	\sim	No	
			Total quantity?	Yes	No	
			Unit (weight or volume)?	(Yes)	No	
			Special handling instructions?	Yes	No	, «;
			Generator's certification including waste minimization statement, generator's signature, and date?	(Yes)	No	NA
		17.	Name, signature, and date of transporter 1?	(Yes)	No	
			Name, signature, and date of transporter 2?	(Yes)	No No	\$1A
	В.	Doe	es generator retain a copy of manifest(s) signed by both generator and transporter? R 28-31-4(d)(4)(A-C))	Yes	No No	NA
	C.	Doe	es generator retain copy of manifest(s) signed and dated by T/S/D/ facility ner/operator for three years? (KAR 28-31-4(f)(1)(A))	Yes	No	V Uk.
1	D.	Has	generator ever failed to receive a signed copy of a manifest within 45 days of initiating ipment?	Yes	No.	
		1.	If yes, was exception report(s) filed? (KAR 28-31-4(f)(4)(B))	Yes	No	(NA)
			If yes, was copy retained for three years? (KAR 28-31-4(f)(1)(A))	Yes	No	
Mar	ife	sting	Requirements: Adequate Inadequate		□ N	A

L	and Disposal Restriction	ons Requirements	(GLB)			
IX.	Does facility generate any wastes subjective CFR 268, Subparts B and C? List these wastes:		•	Yes	No	
	a All wastes	D				
	В	E				
	C					
X.	is the waste(s) covered by a National Va			Vaa		
	A. If yes, describe the variance, extens	sion, or petition which applies:	(40 Ci 11 200 300)	Yes	(No)	
		· · · · · · · · · · · · · · · · · · ·				
					e ta	
XI.	Is the waste covered by an exemption?			Yes	No	***2
	 A. If yes, does the generator provide a the waste is exempt from the land d 	notice with the waste to the T/S/I lisposal restrictions? (40 CFR 268	D facility stating that .7(a)(3))	Yes	No	NA
XII.	Does generator ship waste(s) covered bor disposal?	by the Land Disposal Restrictions	off-site for treatment	Yes	No	
,*·•·	A. If yes, does the generator provide a hazardous waste number(s), applica	notification to the T/S/D facility that the treatment standards, manifest	nat includes: EPA		110	
	waste analysis data, if available? (40	O CFR 268.7)	× 1.0.1.001 (0), u.i.d	Yes	No	
VIII	B. If yes, is a copy of this notification k	•		(Yes)	No	
XIII.	Does generator treat restricted waste(s) restrictions standards? (If yes, fill out land	on-site so that they are below the ond disposal restrictions checklist.)	aland disposal	Yes	No	
La	nd Disposal Restrictions Requirements	s: 🔀 Adequate	☐ Inadequate		N	A
P	re-Transport Requirem	ents (GPT)				
Vn.						
XIV. XV.	• • • • • • • • • • • • • • • • • • •	•	• • • •	Yes	No	NA
	requirements of 49 CFR 172.101 or 172.	102? (KAR 28-31-4(e)(2))		Yes	No	NA
XVI.	Does generator mark (consignee's or co accordance with DOT requirements of 4	onsignor's name and address, etc 10 CFR 172 Subpart D? (KAR 28-3	:.) on each package in	Yes	No	NA
	A. Does generator mark each containe			Yes	No	NA
		s Waste — Federal Law Prohibits Imprope the nearest police or public safety author				
		Generator's Name and Address		:		
		Manifest Document Number				
XVII.	Does generator have placards to offer to F? (KAR 28-31-4(e)(4))	o transporters in accordance with	49 CFR 172 Subpart	Nes	No	NA
						•

	-Transport Requirements:	Adequate	☐ Inadequate		N/	Α
Bi	iennial Reports (GRR)					
	Has generator submitted a biennial repor			Yes	No No	NA NA
	A. If yes, does generator retain copies for (Note: compare quantities reported on la			or those y		
Bie	ennial Report Requirements:	Adequate	☐ Inadequate			
S	pecial Conditions (GSC					
XX.,		ny hazardous waste to or from a	a foreign source?	Yes	No	
* *	(40 CFR Subpart E & F) A. If yes, has generator filed a notice with the control of the control	th the Secretary of Health and I	Environment?	Yes	No	NA
	B. Is waste manifested and signed by a			Yes	No	NA
	C. If generator transports waste out of t been received?	he country, has confirmation of	delivered shipment	Yes	No	(NA
Sp	pecial Conditions Requirements:	Adequate	☐ inadequate		□ N	IA
<u> </u>						
S	torage Requirements (GPT)				
	torage Requirements (·			
	, Does generator temporarily store waste				No No	NA
	Does generator temporarily store waste A. For 90 days or less?			100	No No No	NA NA
	Does generator temporarily store waste A. For 90 days or less? B. For more than 90 days?				No	
	. Does generator temporarily store waste A. For 90 days or less? B. For more than 90 days? C. If waste is stored in containers: 1. Are containers marked with the	before transport?	AR 28-31-4(g)(3) or	(S) (S) (S)	No	NA
	 Does generator temporarily store waste A. For 90 days or less? B. For more than 90 days? C. If waste is stored in containers: 1. Are containers marked with the (h)(1)(D)) 2. Is the accumulation start date m (h)(1)(C)) 	before transport? words: "Hazardous Waste"? (Kalarked on each container? (KAl	R 28-31-4(g)(2) or	(E) (E) (E) (E)	No No	NA
	 Does generator temporarily store waste A. For 90 days or less? B. For more than 90 days? C. If waste is stored in containers: 1. Are containers marked with the (h)(1)(D)) 2. Is the accumulation start date m (h)(1)(C)) 3. Are all containers holding hazar necessary to add or remove waste 	before transport? words: "Hazardous Waste"? (Kalarked on each container? (Kaladous waste closed during storate? (KAR 28-31-4(g)(1) or (h)(R 28-31-4(g)(2) or age except when 1)(B))	(E) (E) (E) (E) (E)	No No No	NA NA
	 Does generator temporarily store waste A. For 90 days or less? B. For more than 90 days? C. If waste is stored in containers: Are containers marked with the (h)(1)(D)) Is the accumulation start date m (h)(1)(C)) Are all containers holding hazar necessary to add or remove wa Does generator conduct weekly deterioration caused by corrosi 	before transport? words: "Hazardous Waste"? (Kalarked on each container? (KAlaus waste closed during storaste? (KAR 28-31-4(g)(1) or (h)(r) inspections of containers for s	R 28-31-4(g)(2) or age except when (1)(B)) signs of leakage and/or (1-4(k))	(res)	No No No	

	Are containers holding ignitible or reactive waste(s) located at least 15 meters (50 feet) from the facility's property line? (EPA Generator and T/S/D Only) (KAR 28-31-4(g)(1) / 40 CFR 265.176)	Yes	No	1
6.7.	If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other means? (KAR 28-31-4(g)(1) or (h)(1)(B) / 40 CFR 265.177) Does generator have any satellite storage areas? (KAR 28-31-4(j))	Yes Yes	No No	
	 is the waste stored in a container at or near the point of generation and under the control of the operator of the process generating the waste? b. Is the container in good condition and closed except to add or remove waste? c. Is the container marked with the words: "Hazardous Waste"? d. Is the container marked with the accumulation start date at the time it becomes full? e. Is the full container moved to the storage area within three days after it became full? (If waste(s) is placed in tanks, piles, or surface impoundments, complete the appropriate inspection checklist.) 	(B)	No No No No	

Storage	Requirements:	Adequate	☐ Inadequate		□ NA	
	sas Generator's Eme	ergency Prepared	iness (GSQ)			
,	a way and and amployee as ami	ergency coordinator? (KAR 28-	31-4(h)(1)(E))	Yes	No	
A.	Is the emergency coordinator availa within a short period of time?	ble to respond to an emergenc	y by todorming and reaming	Yes	No	•
В.	Is the emergency coordinator or his			Yes	No	
C.	Is the emergency coodinator familia	r with the reporting requiremen	its of KAR 28-31-4(h)(2)?	Yes	No	
XXIII. Is ti ass	he following information posted next sessable in an emergency? (KAR 28-	to at least one telephone which 31-4(h)(1)(F))	n is immediately			
A.	Name and telephone of emergency	coordinator?	if available?	Yes Yes	No No	
В. С.	Location of fire extinguishers, fire a Telephone number of fire department	ent unless the facility has a direct	ct alarm?	Yes	No	NA
en	ave employees been trained so that the trained so that the training procedures that are relevant that are relevant to the training (KAR 28-31-4(h)(1)(G))	III to their rooperisionals are	ste handling and normal facility	Yes Yes	No No	
A.	is this training documented in any	way?		, 35		
Kans	as Generator's Emergency aredness Requirements :	☐ Adequate	□Inadequate			IA

(If Kansas generator, stop here.)

COV I		paredness and Prevention (GPT)			
∼v. i f	aci	opropriate, based upon the nature and quantity of waste(s) generated and stored at the lity, is the facility equipped with:			
•	۹.	Internal communication or alarm system easily accessable in case of emergency? (KAR 28-31-4(g)(4)/40 CFR 265.32(a))	Yes	No	
E	3.	Telephone or hand-held two-way radio capable of summoning emergency response personnel? (KAR 28-31-4(g)(4)/40 CFR 265.32(b))			
C) .	Portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment? (KAR 28-31-4(g)(4)/40 CFR 265.32(c))	Yes	No	
).	Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? (KAR 28-31-4(g)(4)/40 CFR 265.32(d))	Yes	No	
Ε	.	Is this equipment (A-C above) tested and maintained to ensure its proper operation? (KAR 28-31-4(g)(4)/40 CFR 265.33)	Yes Yes	No No	
XVI.D)oe:	s a check of the facility show sufficient aisle space to allow unobstructed movement of onnel and equipment? (KAR 28-31-4(g)(4)/40 CFR 265.35)		- -	
XVII.II	ap	propriate for the type(s) of waste handled, has the owner/operator made the fallenting	Yes	No	
	.	Familiarized the local emergency authorities with the facility was a constant.			
	. [Designated one authority where one or more police on fine designation as the	Yes	No	1
	. N	Made agreements with local emergancy recommendations	Yes	No	ı
	•	**************************************	 V	A.I	٠.
D.	. r	'amiliarized local hospitals with the properties of hozpidays was a fact that it is	Yes	No	ı
	. r ii 2	ramiliarized local hospitals with the properties of hazardous waste(s) handled and types of nijuries which could result from fires, explosions, or releases at the facility? (KAR :8-31-4(g)(4)/40 CFR 265.37(a)(4))	Yes	No	1
XVIII.lr	. F ii 2 n ca	ramiliarized local hospitals with the properties of hazardous waste(s) handled and types of			1
KVIII.lr ln	n ca	ramiliarized local hospitals with the properties of hazardous waste(s) handled and types of nigries which could result from fires, explosions, or releases at the facility? (KAR 28-31-4(g)(4)/40 CFR 265.37(a)(4))	Yes	No	1
CVIII.ir In Prepa	n cathe	ramiliarized local hospitals with the properties of hazardous waste(s) handled and types of nigries which could result from fires, explosions, or releases at the facility? (KAR 28-31-4(g)(4)/40 CFR 265.37(a)(4)) assess where local authorities decline to enter into such arrangements, is the refusal entered operating record? (KAR 28-31-4(g)(4)/40 CFR 265.37(b)) Iness and Prevention Requirements: Adequate DITIE! Training (GPT)	Yes	No No	1
VIII.ir In Prepa Per:	n ca the	ramiliarized local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility? (KAR 28-31-4(g)(4)/40 CFR 265.37(a)(4)) asses where local authorities decline to enter into such arrangements, is the refusal entered operating record? (KAR 28-31-4(g)(4)/40 CFR 265.37(b)) Iness and Prevention Requirements: Adequate Inadequate DIFIE Training (GPT) the owner/operator established a hazardous waste management training program? (KAR -4(g)(4)/40 CFR 265.16)	Yes	No No	1
VIII.ir In Prepa Per:	in cathe	ramiliarized local hospitals with the properties of hazardous waste(s) handled and types of nigries which could result from fires, explosions, or releases at the facility? (KAR 28-31-4(g)(4)/40 CFR 265.37(a)(4)) asses where local authorities decline to enter into such arrangements, is the refusal entered operating record? (KAR 28-31-4(g)(4)/40 CFR 265.37(b)) Iness and Prevention Requirements: Adequate Inadequate Onnel Training (GPT) the owner/operator established a hazardous waste management training are seened as a paragement and a paragement training are see	Yes	No No	1
Prepa Per:	n cathe	ramiliarized local hospitals with the properties of hazardous waste(s) handled and types of niuries which could result from fires, explosions, or releases at the facility? (KAR :8-31-4(g)(4)/40 CFR 265.37(a)(4)) asses where local authorities decline to enter into such arrangements, is the refusal entered operating record? (KAR 28-31-4(g)(4)/40 CFR 265.37(b)) Iness and Prevention Requirements: Adequate Inadequate DITIE! Training (GPT) the owner/operator established a hazardous waste management training program? (KAR -4(g)(4)/40 CFR 265.16) the program directed by a person trained in hazardous waste management? (40 CFR 55.16(a)(2))	Yes Yes Yes Yes	No No No No	1
Prepa Per:	SC SC A	ramiliarized local hospitals with the properties of hazardous waste(s) handled and types of niuries which could result from fires, explosions, or releases at the facility? (KAR :8-31-4(g)(4)/40 CFR 265.37(a)(4)) asses where local authorities decline to enter into such arrangements, is the refusal entered operating record? (KAR 28-31-4(g)(4)/40 CFR 265.37(b)) Iness and Prevention Requirements: Adequate Inadequate Onnel Training (GPT) the owner/operator established a hazardous waste management training program? (KAR -4(g)(4)/40 CFR 265.16) the program directed by a person trained in hazardous waste management? (40 CFR 265.16(a)(2)) re new personnel trained within six months after their employment? (40 CFR 265.16(b))	Yes Yes Yes Yes Yes	No No No No No	1
Prepa Per: (IX. Ha 28 A. B.	SC SC SC SC Al	ramiliarized local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility? (KAR 18-31-4(g)(4)/40 CFR 265.37(a)(4)) assess where local authorities decline to enter into such arrangements, is the refusal entered operating record? (KAR 28-31-4(g)(4)/40 CFR 265.37(b)) Iness and Prevention Requirements: Adequate Inadequate DITIENTY (GPT) The owner/operator established a hazardous waste management training program? (KAR -4(g)(4)/40 CFR 265.16) The program directed by a person trained in hazardous waste management? (40 CFR 265.16(a)(2)) The new personnel trained within six months after their employment? (40 CFR 265.16(b)) The new employees supervised until training is completed? (40 CFR 265.16(b))	Yes Yes Yes Yes Yes Yes Yes	No No No No No No	1
Prepa Per: (IX. Ha 28 A. B.	SC as the	ramilarized local hospitals with the properties of hazardous waste(s) handled and types of notices which could result from fires, explosions, or releases at the facility? (KAR 18-31-4(g)(4)/40 CFR 265.37(a)(4)) asses where local authorities decline to enter into such arrangements, is the refusal entered operating record? (KAR 28-31-4(g)(4)/40 CFR 265.37(b)) Iness and Prevention Requirements: Adequate Inadequate DINE Training (GPT) the owner/operator established a hazardous waste management training program? (KAR -4(g)(4)/40 CFR 265.16) the program directed by a person trained in hazardous waste management? (40 CFR 55.16(a)(2)) re new personnel trained within six months after their employment? (40 CFR 265.16(b)) for new employees supervised until training is completed? (40 CFR 265.16(b)) for initial training, are employees trained on an annual basis? (40 CFR 265.16(c))	Yes Yes Yes Yes Yes	No No No No No	1
Peri	SC as the	ramiliarized local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility? (KAR 18-31-4(g)(4)/40 CFR 265.37(a)(4)) asses where local authorities decline to enter into such arrangements, is the refusal entered operating record? (KAR 28-31-4(g)(4)/40 CFR 265.37(b)) Iness and Prevention Requirements: Adequate Inadequate DITIE! Training (GPT) the owner/operator established a hazardous waste management training program? (KAR -4(g)(4)/40 CFR 265.16) the program directed by a person trained in hazardous waste management? (40 CFR 265.16(a)(2)) The new personnel trained within six months after their employment? (40 CFR 265.16(b)) The new employees supervised until training is completed? (40 CFR 265.16(b)) The initial training, are employees trained on an annual basis? (40 CFR 265.16(c)) The program directed by description for each position related to be a paragraphy where	Yes Yes Yes Yes Yes Yes Yes Yes	No No No No No No	1
Peri	SC AI AI AI AI 1.	ramiliarized local hospitals with the properties of hazardous waste(s) handled and types of nighties which could result from fires, explosions, or releases at the facility? (KAR 18-31-4(g)(4)/40 CFR 265.37(a)(4)) asses where local authorities decline to enter into such arrangements, is the refusal entered operating record? (KAR 28-31-4(g)(4)/40 CFR 265.37(b)) Iness and Prevention Requirements: Adequate Inadequate DITIEL FAIRING (GPT) the owner/operator established a hazardous waste management training program? (KAR 4(g)(4)/40 CFR 265.16) the program directed by a person trained in hazardous waste management? (40 CFR 265.16(a)(2)) the new personnel trained within six months after their employment? (40 CFR 265.16(b)) the new employees supervised until training is completed? (40 CFR 265.16(b)) the initial training, are employees trained on an annual basis? (40 CFR 265.16(c)) the site and job description for each position related to hazardous waste management? (40 CFR 265.16(d)(1)&(2)) Description of type and amount of training to be given each person? (40 CFR 265.16(d) C	Yes Yes Yes Yes Yes Yes Yes	No No No No No No	1
Peri	SC AI AI AI AI 1.	ramiliarized local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility? (KAR 18-31-4(g)(4)/40 CFR 265.37(a)(4)) asses where local authorities decline to enter into such arrangements, is the refusal entered operating record? (KAR 28-31-4(g)(4)/40 CFR 265.37(b)) Iness and Prevention Requirements: Adequate Inadequate DITIE! FRINING (GPT) the owner/operator established a hazardous waste management training program? (KAR 4(g)(4)/40 CFR 265.16) the program directed by a person trained in hazardous waste management? (40 CFR 25.16(a)(2)) re new personnel trained within six months after their employment? (40 CFR 265.16(b)) re new employees supervised until training is completed? (40 CFR 265.16(b)) re new employees supervised until training is completed? (40 CFR 265.16(b)) re new employees trained on an annual basis? (40 CFR 265.16(c)) obes the facility maintain the following documents and records: Job title and Job description for each position related to hazardous waste management? (40 CFR 265.16(d)(1)&(2)) Description of type and amount of training to be given each person? (40 CFR 265.16(d) CFR 265.16(d)(3))	Yes Yes Yes Yes Yes Yes Yes Yes Yes	No No No No No No No No	1

	Non Besultaments: Adequate Inade	equate "	
G.		Ye	s No
F.	Does the plan include an evacuation plan for facility personnel that describes signals evacuation routes? (40 CFR 265.52(f))		
(A)	physical description of each item on the list, and a ship.	- 4 1 - A-18	s No
E.	Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? (40)	CFR Yes	s No
	Does the plan describe arrangements made with emergency response agencies? (40 265.52(c))		
	amineione of releases of hazardous waster (40 of 17 200.05 (-7)		
B.	and a standard the emergency actions facility personnel must take to respond to	fires,	. No
_	265.52(d)) Is an emergency coordinator available at all times? (40 CFR 265.55)	Yes	No
A.	es, Does the plan list the name(s), home address, and phone number of designated emergency coordinator(s) in the order in which they should be contacted? (40 CFR	Yes	No
Dos	es the facility have a contingency plan? (KAR 28-31-4(g)(4)/40 CFR 265 Subpart D)	Yes	No
	tingency Plan (GPT)		
		•	

(If EPA generator, stop here.)

Tra	ns	porter Requireme	ents (TBR)		***************************************	
XXXI.Do		this facility transport hazardous			Yes	No
	Ar	e they registered as a hazardou ~31-6 (b))	s waste transporter in the state of	Kansas? (KAR		
В.	Do 26	pes transporter comply with the 3.20(h)?	manifest requirements of 40 CFR	Part 263.20 except	(Yes)	No
C. D.	DC	pes transporter retain a copy of the state o	the manifest for three years? (40 Cours waste subject to the manifest of	FR 263.22(a)) exemption of KAR	Yes	No No
	H y	es, Does the transporter record th	19 Name eddrose and EDA ID No.		Yes	No
		accepted in a log or shipping	o snipping information; and the dapar?	ite the waste was	Yes	No (NA
			record when transporting the was		Yes	No WA
	3.	termination or expiration of the	se records for a period of three ye agreement?	ars after the	Yes	No (NI
Transp		r Requirements:	7			
	orte			Inadequate Onclusions:		□ NA
	·					□NA
	Porte					□ NA
	·					□ NA
	rorte					□ NA
	orte					□ NA
	orte					□ NA
	orte					□ NA
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State of Kansas Joan Finney, Governor





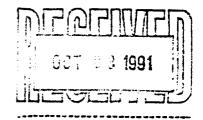
Department of Health and Environment

Azzie Young, Ph.D., Secretary

(913) 296-1600 Reply to:

September 25, 1991

Steve Keiter Hydrocarbon Recyclers, Inc. of Wichita 2549 N New York Wichita, KS 67219



EPA I.D. Number KSD007246846 Re:

Dear Mr. Keiter:

This letter is to acknowledge the subsequent Notification of Hazardous Waste Activity Form your firm submitted on September 18, 1991.

We have updated our records to reflect the change made in contact person and waste codes with the addition of D003, F007, F008, F009, F010, F011, F012, F032, F034, F035, F037, F038, F039, K001, U001, U005, U006, U007, U008, U009, U010, U011, U014, U015, U016, U017, U018, U020, U021, U022, U023, U024, U025, U026, U027, U028, U030, U032, U033, U034, U035, U036, U038, U039, U041, U042, U047, U048, U049, U050, U051, U053, U055, U056, U058, U059, U060, U061, U062, U063, U064, U069, U073, U074, U081, U082, U085, U086, U087, U088, U089, U090, U091, U092, U093, U094, U095, U096, U097, U098, U099, U101, U102, U103, U105, U106, U107, U109, U110, U111, U113, U114, U115, U116, U118, U119, U120, U122, U123, U124, U126, U129, U132, U133, U135, U136, U137, U139, U141, U142, U143, U144, U145, U146, U147, U148, U149, U150, U152, U153, U155, U156, U157, U158, U160, U162, U163, U164, U166, U167, U168, U170, U172, U173, U174, U176, U177, U178, U179, U180, U181, U182, U183, U185, U186, U187, U189, U190, U191, U192, U193, U194, U197, U200, U201, U202, U203, U204, U205, U206, U212, U214, U215, U216, U217, U218, U219, U221, U222, U223, U222, U223, U234, U235, U236, U237, U238, U240, U244, U246, U247, U248, U249, U328, U353, P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, P033, P034, P036, P037, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049, P050, P051, P054, P056, P057, P058, P059, P060, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P975, P076, P077, P078, P081, P082, P084, P085, P087, P088, P089, P092, P093, P094, P095, P096, P097, P098, P099, P101, P102, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P118, P119, P120, P121, P122 and P123.

Steve Keiter Hydrocarbon Recyclers, Inc. of Wichita September 25, 1991 Page 2

This change in status is effective immediately. A subsequent notification shall be submitted to this office whenever the information originally submitted to obtain an EPA I.D. Number has changed. If I can be of further assistance, please contact me at (913) 296-6898.

Sincerely,

Gigi Perry

Administrative Officer Hazardous Waste Section

Bureau of Air and Waste Management

C SCDO - BAWM

MIKE HAYDEN
Governor
JACK D WALKER, M.D.
Secretary

STATE OF KANSAS



Forbes Field Topeka, KS 66620-000* (913) 862-9360

DEPARTMENT OF HEALTH AND ENVIRONMENT

RCRA Compliance Inspection Report

T/S/D Facilities Checklist

A.	<u>General</u>										
	Date	9:00 AM EPA ID No	. KSD007246846								
	Facility Name Hydrocarbon Recyclers, Inc.										
	Street 2549 N. New York										
	CityWichita	, Kansas Zi	p 67219								
<i>₩</i> ₽*	County Sedgwick										
ů?	Contact Steve Keiter, Facili	ty Manager Ron Robertson,	Facility Safety and Compliand								
	Inspector Teresa Hansen, Siew	Kour, Kris Goschen EPA Regi	on VII								
	Other										
В.	Activity at Site										
	Treatment	Storage	Disposal								
:	Chem/Phys/Bio Treatment	Drums	Incineration								
• .	Filtration	Pile	Landfill								
-	Incineration	Surface Impoundment	Land Treatment								
	Recycling/Recovery	X Tank, Above ground	Surface Impoundment								
-	Reprocessing	Tank, Below ground	Other ()								
	Solvent Recovery	Other ()									
ا 👡 ھود	Thermal Treatment										
	Volume Reduction										
	Waste Oil										
	Other ()										

		Comments:				•
			·.			
	C.	Waste Analy	sis Plan			
265.13			cility maintain a copy of its waste analysis the facility?	YES	NO	
		A. If	yes, does the plan include:			
	<u> </u>	evacean (1.	Parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters.	YES	NO	
		2.	Test methods which are used to test for these parameters.	YES	NO	
The second secon	en e en	20073 	Sampling method used to obtain sample.	YES	NO	
and Congrident	្រុងទៀវច		Frequency with which the initial analysis will be reviewed or repeated to ensure the analysis is current.	YES	NO	
ر مانده و میدمود. • فاصله و میدمود	a Di Pinalinga, pro-	5.	For off-site facilities, the waste analyses that generators have agreed to supply.		NO	N
The property against the property of the prope		6.	For off-site facilities, the procedures which are used to inspect and analyze each movement of hazardous waste received to ensure that it matches the identity of the waste designated on the manifest.	YES	NO	N
Waste analys	is pla	an requiremen	nts:	·	· · · · · · ·	
[] Ade	quate	[]Inac	dequate			
	D.	Security				
265.14			ne facility provide either of the following:			•
			24-hour surveillance system? (T.V. monitoring guards).	YES	NO)
		c] (a	artificial or natural barrier (fence, fence and iff combination) and a means to control entry ttendant, T.V. monitoring, locked entrance, concolled roadway access).	YES) мо	

2. Does the facility provide warning signs at entrances.

YES

3. Does the facility consider itself exempt from security requirements?

YES NO

Security requirements:

Adequate

[] Inadequate

[] Not Applicable

E. General Inspection Requirements

265.15

 Does the owner/operator maintain a written schedule at the facility for inspecting:

a. Monitoring equipment

YES NO

b. Safety and emergency equipment

(YES) NO

c. Security devices

YES) NO

d. Operating and structural equipment

YES) NO

2. Does the inspection schedule identify the types of problems which are to be looked for during the inspections?

YES NO

3. Does the owner/operator maintain an inspection log?

YES) NO

a. If yes, does the log contain the:

1. Date and time of inspection

YES NO

2. Name of inspector

(YES) NO

3. Notation of observations

YES) NO

4. Date and nature of repairs or remedial action

(YES) N

YE

NO

Inspection requirements:

M Adequate

[] Inadequate

F. Personnel Training

265.16

 Does the owner/operator maintain at the facility, the following documents and records:

gr ^{an}	а	. Job title and job description for each position related to hazardous waste management.	YES	NO	₹ /
	b	. Description of type and amount of training to be given each person.	YES	NO	
	c	. Records of training given to facility personnel.	(ES)	NO ,	
Personnel training	requi	rements:		*************************************	
[] Adequate	. [] Inadequate			
G.	Requi	rements For Ignitable, Reactive, or Incompatible Wastes	<u> </u>		
265.17	1. [oes the facility handle ignitable or reactive wastes?	YES	NO	
	ē	If yes, is the waste separated and confined from sources of ignition or reaction, sparks, spon- taneous ignition, and radiant heat?	YES	NO	NA
		re smoking and open flames confined to specially lesignated locations?	YES	NO	NA
	3. /	re "No Smoking" signs posted in hazard areas?	YES	NO	NA
	4. [loes a check of these areas show any leakage or corrosion of containers?	YES	NO	NA
	5. (Ooes a check of these areas show evidence of heat generation from interaction of incompatible wastes?	YES	NO	NA
Ignitable, reactiv	e, or	incompatible waste requirements:			
Adequate	Ľ] Inadequate [] Not Applicable			
H:	Prep	aredness and Prevention			
265.31		Does an inspection of the facility show any evidence of fire, explosion, or contamination?	YES	NO)
265.32		If applicable to the facility, is the facility equipped with:			•
	·	a. Internal communication or alarm system easily accessible in case of emergency?	YES	NO	NA
		b. Telephone, hand-held two-way radio capable of summoning emergency response personnel?	YES) NO	NA

	3.	Are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination	•		
1		equipment provided?	YES) NO	NA
, • ***.	4.	Is water of adequate volume provided for hose streams foam producing equipment, sprinklers, etc.?	YES) NO	
265.33	5.	Is this equipment (1-4 above) tested and maintained to assure its proper operation?	YES) NO	NA NA
265.35	6.			, ,,,	· · ·
265.37	7.		(YES)	NO	NA
inatarita	(C)	If appropriate for the type(s) of waste handled has the owner/operator made arrangements with the local emergency authorities to familiarize them with the layout of facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside facility, and possible evacuation routes?			
	8.	In areas where more than one police and fire department might respond, is there one designated authority?	YES	NO (NA (NA)
	9.	If appropriate for the type(s) of waste handled does the owner/operator have agreements with State emergency response teams, emergency response contractors, and equipment suppliers?	YES	NO () NA)
	10.	If appropriate for the type(s) of waste handled has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility?	YES	NO) NA
*** 2	11.	In cases where state or local authorities decline to enter into such arrangements, is the refusal entered in the operating record?			~
		and operating records	YES	NO (NA)
·		ntion requirements:		-	
I.	Cont	ingency Plan and Emergency Procedures		<u> </u>	
262.53	1.	Is a contingency plan maintained at the facility and have copies been provided to outside agencies which may be called upon to provide emergency services?	(YES)	NO	
262.52	2.	Does the plan describe arrangements made with emergency response personnel?		10	

	3.	Does the plan list the name(s), home address, and phone number(s) of the designated emergency coordinator(s)?	YES (NO	1 -
265.55	4.	Is an emergency coordinator available at all times?	YES	NO	
	5.	Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities?	YES	NO	
And the second s	6.	Does the plan include an evacuation plan for facility personnel?	YES	NO	
[] Adequate		Inadequate Change in Emergency Cook	<u>lina</u>	tor_	Lis —
J.	Man	ifest System, Recordkeeping, and Reporting			
265.71	1.	Does the facility receive waste from off-site?	(YES)	NO	
		a. If yes, does the owner/operator sign and date each copy of the manifest and give a signed copy to the transporter?	YES	NO	NA
		b. Does the owner/operator send a signed copy of the manifest to the generator within 30 days of the delivery?	YES	NO	NA
**************************************		c. Does the owner/operator retain a copy of manifest?	YES	NO	NA
	2.	Does the facility receive any waste from a rail or wate (bulk shipment) transporter?	r YES	NO)
		a. If yes, is the shipment accompanied by a shipping paper containing the appropriate information?	YES	NO	NA
		 If yes, does the owner/operator sign and date the shipping paper and provide the transporter with a copy? 	YES	NO	NA
		Does the owner/operator send a signed copy of the shipping paper to the generator within 30 days of the delivery?	YES	NO	NA
•		3. Does the owner/operator retain a copy of the shipping paper?	YES	NO	NA
365.72	3.	Has the facility received any shipments of waste which were inconsistent with the manifest?	YES	NO)

•		1.	If no, was the Regional Administrator notified?	YES	NO	(N/
265.73	4. Do a	oes t	he owner/operator keep a written operating record facility?) NO	
	. a.	. If	yes, does the operating record include:			
	in a section of the s	1.	A description and the quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, and disposal?	s S YES) NO	N <i>A</i>
		2.	The location of each hazardous waste within the facility and the quantity at each location?	YES	NO NO	NΑ
ner gøle. Mil		3.	Records and results of waste analyses?	YES	NO	NA
	en de la compete de la compet	4.	Reports and details of incidents requiring implementation of the contingency plan?	YES	NO	(NA
		5.	Records and results of required inspections?	YES	NO	NA
	e _m e	6.	Monitoring, testing, or analytical data?	YES	NO	NA
• • • • • • • • • • • • • • • • • • • •		7.	Closure cost estimates (and for disposal facilities, post-closure cost estimates)?	YES	NO	NA
265.76	; a	II UIII	facility received any waste, which does not der the small generator exclusion, not aceed by a manifest or shipping paper?	 YES	(v))
	a.	If y	yes, was an unmanifested waste report submitted the Regional Administrator?	YES	NO ((NA
inifest syst			and reporting requirements:			•

a. If yes, was an attempt made to reconcile the discrepancy with the generator and transporter?

K. Closure and Post-Closure

265.112

 Does the owner/operator have a written closure plan for the facility?

YES N

YES NO (NA

a. If yes, does the plan include:

 A description of how and when the facility will be closed?

YES NO

265.144	OW:	ner/ st o	facility is a disposal facility, does the operator have a written estimate of the annual f post-closure monitoring and maintenance of cility?	YES	NC) NA
265.143	su: Reg	rance gion	e owner/operator established financial as- e for facility closure and notified the al Administrator? (Required after 7-6-82).	YES	NO	
265.142			he owner/operator have a written estimate of osure cost?	YES	NO	
L.	Financi	ial i	Requirements			
[] Adequate	[].	Inac	dequate .		•	
Closure and post-c	closure r	equi	irements:			
A CONTRACTOR OF THE STATE OF TH				· · · · · · · · · · · · · · · · · · ·		<u></u>
		3.	The name, address, and phone number of the person or office to contact during the post-closure period?	YES	NO	NA
	HA WATER		tures where applicable, and the function of the monitoring equipment?	YES	NO	NA
	ekir. Lipakir	2.	Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment struc-			
		1.	Ground-water monitoring activities and frequencies at which they will be performed?	YES	NO	NA
	a.	If	yes, does the plan include:			
265.118	2. If own	the er/o	facility is a disposal facility, does the perator have a written post-closure plan?	YES	NO	NA
		J.	and a schedule for final closure which includes the total time required to close the facility and the time required for intervening closure activities which allow tracking closure pro- gress?	YES	NO	
en e		£	taminate facility equipment at the time of closure? An estimate of the expected year of closure	YES	NO	
•		4.	during the facility life? A description of the steps needed to decon-		110	
***		3.	An estimate of the maximum inventory of wastes in storage or in treatment at any given time	YES	NO	
		2.	A description of the steps necessary to completely close the facility?	YES	NO	•

265, 145

4. Has the owner/operator of the disposal facility established financial assurance for post-closure care and notified the Regional Administrator? (Required after 7-6-82)

YES NO

265.147

Has the owner/operator obtained liability insurance for sudden occurrences of at least \$1 million with an aggregate of at least \$2 million exclusive of legal defense costs? (Effective 7-15-82).

YES NO

If the facility is a disposal facility, has the owner/operator obtained liability insurance for nonsudden and accidental occurrences of at least \$3 million per occurrence with an annual aggregate of at least \$6 million exclusive of legal defense costs? (Effective 7-15-82)

YES NO

Financial requirements:

[] Adequate [] Inadequate

Management of Containers

265.170

1. Are containers presently used to store hazardous waste? (YES)



- If no, do not complete questions 2-5.
- If yes, check condition of containers and for evidence of incompatibility of waste with containers.

Containers in poor condition

Condition of Containers:

[] Adequate Inadequate [] Not Applicable 265.173 2. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? (YES) NO NA 265.174 Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leakage and/or deterioration caused by corrosion or other factors?

	265.176	4.	Are containers holding ignitible or reaction located at least 15 meters (50 feet) from property line?	the facility's (YES) NO NA
	265.177	5.	If waste in containers is incompatible wit materials stored nearby, in other containe open tanks, or surface impoundments, are t separated from the other materials by mean berm, wall, or other device?	rs, piles, he containers
ana	gement of	Containe	rs:	•
	Adequ	ate] Inadequate [] Not Applicable	
	Note:	Determi	ne if owner/operator claims any information	confidential.
- деврей ж .д	Note:	(i.e. t	applicable checklists for specific facili anks, surface impoundments, piles, land tre ls, groundwater monitoring).	ty types atment,
to agree	Additiona	al Inform	ation and CONCLUSIONS	
		្តីទទេ ១ ភ្នាក់ <u>-</u>		
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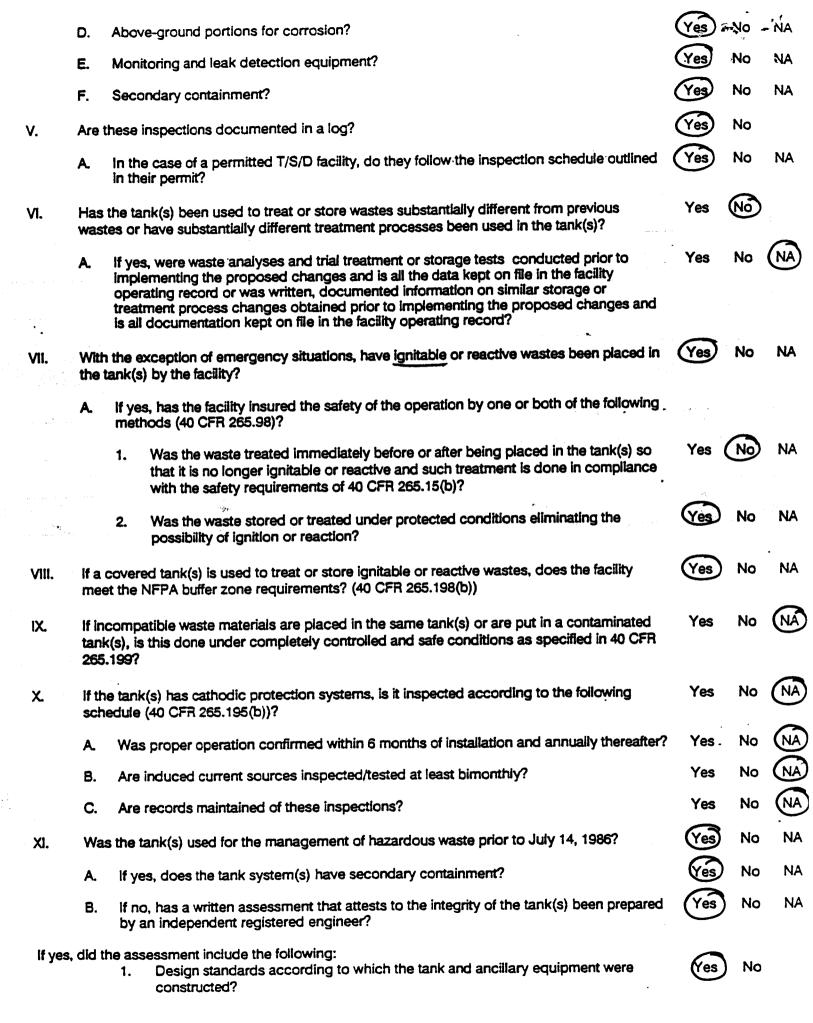
Form: TSD 4/82



Kansas Department of Health and Environment Bureau of Waste Management Forbes Field, Topeka, Kansas 66620 (913) 296-1600

Tank Inspection Checklist

Ü۱	wner into	ormation						
Date	7-28-92	2	EPA I.D. No.	KSD0072468	46			
Facili	ty Name	lydrocarbon Recyc	lers, Inc.					
Street	2549	N. New York				24.		
City _	Wichi	.ta			_, Kansas Zip	67219		
Ta	nk infor	matics:			-			
e la	ite itiiOH	nauon						
		Tank #1	Tank	#2	Tank #	3		
Descr	iption:	See attached sh	eet.					
Capac	city:	·						
Substa	ance Stored:		- 1 					,
Waste	Code:					· · · · · · · · · · · · · · · · · · ·		
Location	on:							
Exi	sting Ta	nk System(s	5)					
l .	is the tank(s)	labeled with the word	s "Hazardous Waste"	? (KAR 28-31-4)	<u></u>		
l.	•					Yes	No	
	man — opar oo	is not covered, does it ntainment system with would provide? (40 CF	I a canacity insteady	60 cm) of freeboa als or exceeds th	ard unless equippe e volume that 2 fe	ed Yes et .	No	(NA)
li.	Is the tank(s) 265.192(b and	equipped with a wasted	e-feed cutoff or bypa:	ss system(s) as r	equired by 40 CFF	Yes	No	
V.	Are daily inspe	ections made of all sys	stems pertinent to the	9 Droper operatio	on of the tank?		Ma	
		ge and cutoff systems		, -p operanc	a. a.o milit;	Yes	No No	N/A
	B. Tank lev	el and freeboard?				Yes	No	NA NA
	C. Drainage	systems?				Yes	No	



		2.	Existing corrosion protection measures?		Yes	No	(NA)
ئى. چىنىنىڭ بىرىنى	~	3.	Hazardous characteristics of the waste to be handled?	•	Yes) No	
' <i>t</i>		4.	Documented age of the tank system (if available) or estimate of the age?		Yes) No	
		5.	Results of a leak test, internal inspection, or other tank integrity examinate the results of this test show the tank to be leaking or unfit for use, the own implement 40 CFR 265.196.)	on? (If ner must	Yes) No	
		6.	Is the leak test conducted annually by an independent, qualified, registere engineer? (40 CFR 265.193(i)(1) and (2))	ed .	Yes	No	
		7.	Are records of the assessment results maintained on file at the facility?		Yes	No	
Schedu	ie da	ate wi	nen secondary containment is required per schedule in 40 CFR 265.193(a)	(1 through:	5)		
Exist	ing	Tank	System(s)	dequate		Inade	quate
				1			
	*****	~~					
Nev	VΤ	an	k System(s)				
(11.	ls the	e tani dule	system(s) required to have secondary containment (new system or accordin 40 CFR 265.193(a)(1 through 5)?	ding to	Yes	No	
1	A.	If yes	s, has the owner or operator requested a variance from the secondary ainment? (40 CFR 265.193(g and h)		Yes	No	NA
1	В.	If yes	s, does the secondary containment meet the following minimum requirement 265.193(b and c)	nts? (40			-
		1.	Constructed of or lined with materials compatible with the waste and of su strength?	fficient	Yes	No	NA
		2.	Placed on a structurally adequate foundation?	(Yes	No	NA
		3.	Provided with a leak detection system capable of detecting releases within hours?	24 (Yes	No	NA
		4.	Adequately sloped or designed and operated to drain and remove liquids fleaks, spills or precipitation?	rom (Yes	No	NA
•) .	if yes 265-1	s, does the secondary containment include one of the following: (40 CFR 193(d))				
		1.	External liner?		Yes	(No)	NA
		2.	Vault?	(Yes	No	NA
		3.	Double-walled tank?		Yes	(NO)	NA
		4.	Equivalent device approved by the Secretary?		Yes	No	NA

	D.		s, does the secondary containment satisfy the following requirements: (40 CFR 193(e))	4 :	د مهمی د	
			a and Vaulte			•
FOF EX	ema	1.	s and Vaults Adequate capacity to contain 100% of the largest tank within its boundary?	Yes	No	NA
		2.	Designed or operated to prevent infiltration of precipitation into the containment system unless it has adequate capacity to contain a 25 year, 24 hour rain event?	Yes	No	NA
		3.	Free of cracks or gaps?	Yes	No	NA
		4.	Completely surrounds the tank and surrounding earth likely to be exposed to waste if a release occurs?	Yes	No	NA
For Va	uits	1.	Constructed with chemical-resistant water stops at all joints?	Yes	No	NA
1.0		2.	Provided with an impermeable coating or lining over the concrete?	Yes	No	NA
		3.	Protected against vapor ignition, if required due to the waste characteristics?	Yes	No	(NA
		4.	Provided with an exterior moisture barrier?	Yes	No	(NA
For Do	ouble	-Waii	ed Tanks			
. 0. 50	<i>,</i>	1.	Designed as an integral structure for containment of releases?	Yes	No	NA NA
		2.	If metal, is it protected from corrosion, if metal?	Yes	No	(Z)
•		3. `	Provided with a built-in continous leak detection system capable of detecting releases within 24 hours?	Yes	No	N/
XIII.	is a	ncilla	y equipment provided with adequate secondary containment? (40 CFR 265-193(f))	Yes	No	N/
XIV.			ank system or secondary containment system had a leak or spill or was it ed to be unfit for use?	Yes	(No) N/
	A.	lf ye take	es, was it immediately removed from service and appropriate follow-up actions en as required by 40 CFR 265.196 (b through e)?	Yes	No	(Z)
XV.	witt	1 40 C	ve repair has been conducted on the tank system was it recertified in accordance CFR 270.11(d) and such certification submitted to the Secretary within 7 days? (40 .196(f))	Yes	No	(N
Nev	w Tar	ık Sy	stem Requirements Adequate		Inad	equat
<u> </u>					***	
Comn	nents	:				
						
			·		, 	4

Hazardous Waste Tank Storage (S02) Service¹

VESSEL	CAPACITY - WORK (gal)	CAPACITY - MAX (gal)	LOCATION
V-1	7,181	7,363	
V-2	7,084	7,084	Process Area
V-3	7,181	7,363	Process Arss
V-4	7,181	7,363	Process Area
V-5	20,895	20,895	Process Area
V-6	20,895	20,895	Process Area
V-7	7,181	7,363	Process Area
V-\$. 7,181	7,363	Process Arms
V-9	5,078	5,078	Process Area
V-10	5,078	5,078	Building D
V-11	5,078	5,078	Building D
V-12	5,078	5,078	Building D
V-13	5,078	5,078	Building D
V-14	5,078	5,078	Building D
V-15A	2,659	2,659	Building D
V-15B	2,659	2,659	Building D
V-15C	2,659	2,659	Building D
V-15D	2.659	2,659	Building D
V-16	9,028	9,028	Building D
V-17	522	522	Building D
V-18	489	489	Process Area
V-26	1,129		Building D
Y-29	90	1,155	Process Area
V-30	90	90	Building D
V-31 ·	115	90	Ariiding D
V-32	115	115	Building D
7-34	539	115	Building D
DTAL	138,000	138,936	Process Area

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Bethlehem Apparatus Company, Inc.

890 Front St., P.O. Box Y, Hellertown, PA 18055 • 215-838-7034 • FAX 215 838-6333 • TELEX 494-9195

DATE: March 16, 1992

CUSTOMER: USPCI Hydrocarbon Recovery Services

2549 N. New York Wichita, KS 67219

ATTN: Joe Dowdey

Materials outlined in Waste Profile No.R-6571 dated 3/12/92 have been approved for Mercury Recovery/Recycling.

Bethlehem is strictly a mercury recovery/recycling facility, and cannot accept manifested materials with Waste Codes other than D009. (1) materials are sent under Waste Code U151, we may have to reject the shipment.

We will only accept materials packaged in steel containers; flasks, 5 gallon, 55 gallon, or 85 gallon. Materials shipped in plastic or Fiber containers will not be accepted for delivery.

Bethlehem will issue a work order to our receiving dock to accept your material for processing provided the following:

X	Α	purchase	order	is	issued	to	cover	the	costs	of	processing.
---	---	----------	-------	----	--------	----	-------	-----	-------	----	-------------

X An updated Mercury Recovery/Recycling Agreement is signed and returned for our files.

Credit terms have been established.

Shipments will not be received without work authorization. Please be sure the above items are established before shipment is made.

If you have any questions, please let us know.

Yours very truly,

BETHLEHEM APPARATUS COMPANY, INC.

Bruce J. Lawrence

President

BJL/jps

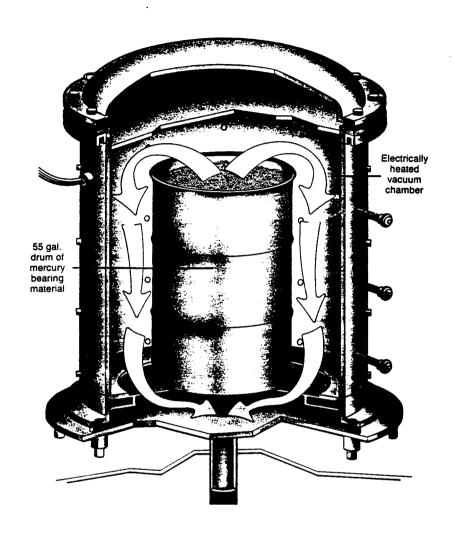
NOTE: A Land Ban form is now required with each shipment.

MERCURY RECOVERY/RECYCLING SERVICE

Bethlehem has developed a high vacuum mercury retort recovery still for processing EPA D009 hazardous waste. The recovery system heats mercury bearing materials up to 1,350 degrees F. Mercury vapor is condensed in a water cooled condenser for transfer to our vacuum triple distillation units. Since the recovery system operates under high vacuum the exhaust from the vacuum pumps is easily scrubbed and passed through treated activated charcoal for mercury vapor removal. No exhaust stack or Air Quality Permits are required for the system. Residue from the process must pass TCLP analysis for mercury before it is sent to an industrial non hazardous waste landfill.

Each mercury recovery high vacuum retort system is controlled with a microprocessor temperature controller capable of running 16 different programmed temperature cycles for the wide variety of materials to be processed. To date we have processed the following types of materials:

- · fever and industrial thermometers
- · metal switches
- quartz lamps
- dental amalgams
- ignitron tubes
- mercury in soil
- telephone switches porisimitry samples
- sphygmomonometers
- barometers
- glass switches
- mercury batteries
- thermocouples
- mercury sludges
- mercury rectifiers
- mercury relays manometers
- mercuric oxide
- pc board relays



FOR MORE INFORMATION ASK FOR A MERCURY RECOVERY PACKET!

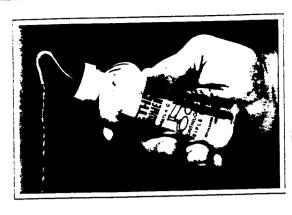
All shipments must have prior approval before they are accepted for processing. All materials that are processed in our recovery retort distillation units are considered HAZARDOUS WASTE, and must be sent using a Pennsylvania Hazardous Waste Manifest.

To receive authorization for shipments you must obtain a work authorization number from our office. Authorization numbers will be issued for each shipment provided there is a signed Recovery/Recycling Agreement on file and your waste is on our Material Acceptance List. For new materials to be approved there must be samples and material analysis sent for evaluation.



Bethlehem Apparatus Company, Inc.

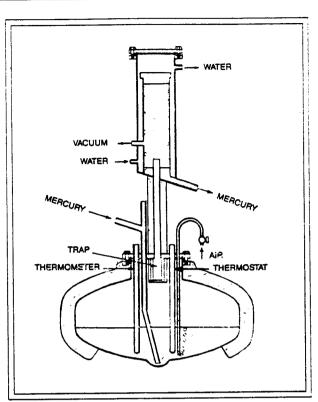
EETHLEHEM CONTINUOUS VACUUM TRIPLE DISTILLATION



Best in
PURITY
PACKAGING
SERVICE

OVER 7 (SEVEN) MILLION POUNDS SHIPPED to manufacturers, research laboratories, process and control industries.

SiNGLE STAGE MERCURY Still and Condenser, Schematic Diagram. Three stages of this type operating in tandem are required to produce the highest purity mercury, needed in crystal growth technology systems and other high purity applications.



...only from BETHLEHEM PRIME VIRGIN SOURCE MERCURY

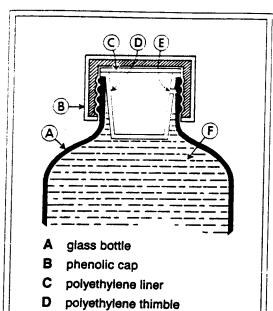


Bethlehem now exclusively offers guaranteed prime virgin source mercury, vacuum triple distilled and packaged in glass or polyethylene bottles with Bethlehem's patented* Thimble Trap. Analysis of this metal by Atomic Absorbtion shows values near or below detection limits (see analysis).

ANALYSIS OF EVAPORATED MERCURY RESIDUE SAMPLE IN PARTS PER BILLION*

CALCIUM CHROMIUM, total	0.16
COPPER	1.79
IRON	1.06
LEAD	0.10
MAGNESIUM	0.010
MANGANESE	0.14
MERCURY	0.0015
NICKEL	0.043
SILVER	0.0058
TIN TITANIUM ZINC BORON SILICON 'Based on 300 lbs. (168,000 grams) of c	0.32 0.029 0.042 < 1.88 0.51 listilled Mercury.

BETHLEHEM THIMBLE-TRAP* GLASS BOTTLE PACKAGING



overspill thimble-trap

continuously distilled three times under vacuum

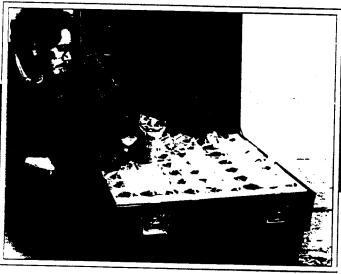
prime virgin source mercury-

Ε

With Bethlehem's patented. "THIMBLE TRAP", continuously vacuum triple distilled prime virgin source mercury can be shipped, for the first time. without ring formation at the meniscus and oxides on the mercury surface. For technical details ask for reprint "Mysterious Ring Appears at Meniscus of Bottled Mercury", Ind. Res. Feb. 1982.

*Patent No. 4,416,382

The "WELLS FARGO" styrofoam lined steel box with security lock for 10 lb. glass bottles sealed in individual polyethylene bags.
Holds 63 units with patented "THIMBLE TRAP".

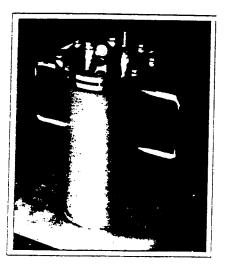


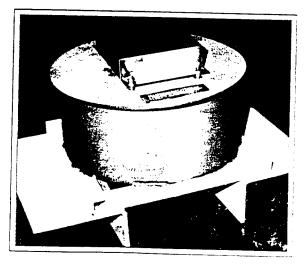
11 lb. glass bottles in "WELLS FARGO" steel box

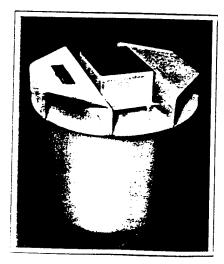
RETURNABLE SHIPPING CONTAINERS

Mercury Reusable Shipping Containers

Stainless Steel Containers: 100 lb., 800 lb., 2,000 lb. Each container has a flanged top plate with a compression fitting for air pressure inlet, a pressure relief valve, and a 1/4" pipe out.







BETHLEHEM MERCURY CLEANING

We clean our Mercury by distilling three times in continuous stages under high vacuum and controlled low temperatures. All instrument Mercury is shipped with a Certificate of Analysis.

We Return our cleaned mercury in 8.5 oz., 1-, 6-, and 16 pound polyethylene bottles; or 1-, 5-, or 10 pound glass bottles. The small polyethylene bottles have dispensing tips. The glass bottles use the patented "THIMBLE TRAP" system. All shipments are in full bottles. Charges for new mercury or credits for purchased scrap mercury are applied to the nearest full bottle.

Mercury Flasks, the standard shipping container for 99% liquid mercury, can be obtained at no charge if the mercury is being sent back for cleaning. 76 lb. capacity and 2,000 lb. capacity flasks are available. There may be a charge for disposal of liquid mercury.

Terms: 30 days net for cleaning mercury. All mercury received and shipped F.O.B. Hellertown, PA. Do not send mercury by US PARCEL POST. It is against Postal Regulations.

	ESSING SH	RINKAGESCHEDULE
FOR MERC	URY RECEI	VED AS LIQUID METAL
Net Wt.	% Loss	Net Wt. % Loss
0- 49 lbs.	5%	500-999 lbs. 1.5%
50-199 lbs.	3%	1000 + lbs. 1%
200-499 lbs.	2.5%	

À		UNIFORM HAZARDOUS 1. Generator's US EPA II WASTE MANIFEST	Doc:	ument No.	2. Page 1 of 1		n the shaded areas d by Federal law.
	3.	Generator's Name and Mailing Address			A. State Ma	nifest Documen	t Number
ו		Jan Jaters & Rogers Inc Emer	gency Phone:	22 / 21	2 Chara Ca	nomenda ID	
			CHEMTREC 1-8	9300 9300	B. State Ge	nerators ID	
1	4.	Generator's Phone (402) 733-7009 Transporter 1 Company Name 6.	US EPA ID Numb		C. State Tra	ansporter's ID	NED040906729
		Van Vaters & Rogers Inc.	PAPPPF	7 2 9	D. Transpor		
		Transporter 2 Company Name 8.	US EPA ID Numb	er		insporter's ID	
			110 5 3 4 1 3 4 1		F. Transpor		
		Designated Facility Name and Site Address 10.	US EPA ID Numb	er	I .	07246846	
		hyderocarbon Recyclers Inc. 2549 N. New York St.			H. Facility's		
		Vichita. 35 6673 67219	000724	6 8 4 6	316	<u>-268-9490</u>	·
			ss and ID Number)	12. Conta	T 1	13. 14. otal Unit	Waste No.
G		US DOT Description (Including Proper Shipping Name, Hazard Clase		No.	Type Qu	antity Wt/Vo	
E N	a.	Z RO Waste flammable liquid; Solid.	n.0.8.				F005,F003,
E		flammable solid, UN 1325 (F005,F003, (Methyl Ethyl Ketone, Kylene) (ERG 32)	1)	0001	DIMOIO	5 0 8 P	D001_D035
A	b.	(BERYL MERVI RECORE, INTERES (SRO 32					;*****
OR							
î							
	C.						;
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	d.						-
Ш				111			A CALL
		Additional Descriptions for Materials Listed Above	19		K Handling	Codes for Wast	es Listed Above
		A. Byron Originals Lot#16153 Profile# 89532 (WI 91-4617)		सम्बद्धाः स्वर्गाति स्वर्गेष्ठाः स्वर्गाः स्वर्गेस्य	an Karaya Janaan		
	15	. Special Handling Instructions and Additional Information					
	16	GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consproper shipping name and are classified, packed, marked, and labeled, and are according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place the conomically practicable and that I have selected the practicable method of tuture threat to human health and the environment; OR, if I am a small quit the best waste management method that is available to me and that I can afford	to reduce the volume as of treatment, storage, or antity generator, I have	nd toxicity of	waste generated	d to the degree I to me which mini	mizes the present and
	-	Printed/Typed Name	Signature	<i>F</i> / -	7/72	-	Month Day Year
Y	_ '	SCOTT I Ohr, YUX	1 , ,,,,,,,,	<i>16 /</i>		<u> </u>	KERPYK
TR	17	7. Transporter 1 Acknowledgement of Receipt of Materials	Signature /	1/	- 1:		Month Day , Year
A	V	Printed/Typed Name	Signature	alun	Ul,		10157261512
SPO	4	3. Transporter 2 Acknowledgement of Receipt of Materials					
A T E		Printed/Typed Name	Signature				Month Day Year
R FAC-		Discrepancy Indication Space					
}	20	 Facility Owner or Operator: Certification of receipt of hazardous 		y this manif	est except as	noted in Item 1	
Ţ		Printed/Typed Name	Signature	, 1	- 16	0610	Month Day Year
Sty	o F15	5 REV-6 Printed by Labelmaster, An American Labelmark Co., Chicago, IL 60646 (800)621-5	808		EPA Form 8	700-22 (Rev. 9-88) I	Previous editions are obsoleti

USPCI, INC.

RECYCLING/TSD HANDLING AGREEMENT

(GENERATOR AND RECYCLING/TSD CONTRACTOR)



WHEREAS, Generator produces spent chemicals which may be considered to be "hazardous" or "toxic" within the meaning of applicable federal and state laws ("Spent Chemicals") and which therefore must be transported, stored, disposed of, recycled, treated or re-used ("Handled") in accordance with applicable laws pertaining to hazardous or toxic chemicals;

WHEREAS, Recycling/TSD Contractor owns or controls facilities which are capable of Handling Spent Chemicals in accordance with all applicable laws pertaining to such activities:

WHEREAS, the parties desire to enter into an arrangement for the Handling of Spent Chemicals, all on the terms and conditions hereinafter set forth;

NOW, THEREFORE, in consideration of the covenants and agreements contained herein, the undersigned agree to the following terms and conditions of this Recycling/TSD Handling Agreement as well as to the Standard Terms and Conditions Governing the Handling of Spent Chemicals ("Standard Terms and Conditions"), which are attached to the Generator copy of this Agreement and are incorporated herein by reference. All capitalized terms not otherwise defined herein shall have the meanings set forth in the Standard Terms and Conditions.

- 1. SPENT CHEMICALS SHIPMENT. The completed Uniform Hazardous Waste Manifest or appropriate state manifest which is identified by the reference number appearing in a space below the signatures to this Agreement and which pertains to the Spent Chemicals Shipment Handled under this Agreement is hereby incorporated herein by reference. Such manifest describes certain Spent Chemicals which Generator hereby agrees to ship to Recycling/TSD Contractor and which Recycling/TSD Contractor agrees to Handle at the facility named in such manifest ("Designated Facility").
- 2. COLLECTION, TRANSPORTATION, STORAGE: AND DELIVERY. All Spent Chemicals Shipments shall be transported to Recycling/TSD Contractor by Van Waters & Rogers Inc., a Washington Corporation ("VW&R"), or an entity designated by VW&R to provide transportation and temporary storage services.
- 3. PAYMENT. It is understood that VW&R shall pay Recycling/TSD Contractor for Handling the Spent Chemicals Shipment (or, where money is owed to Generator, VW&R shall pay Generator for the Spent Chemicals Shipment) according to the terms of a certain Master Spent Chemicals Handling Agreement between Recycling/TSD Contractor and VW&R. Recycling/TSD Contractor shall not look to Generator for payment for Handling the Spent Chemicals Shipment, except for certain extraordinary charges incurred in connection with Nonconforming Spent Chemicals as set forth in the Standard Terms and Conditions.
- 4. INDEMNIFIED PARTY. As used in the Standard Terms and Conditions, the term "Indemnified Party" shall mean either Recycling/TSD Contractor or Generator, depending upon which party claims indemnification under this Agreement.
- 5. GENERATOR INDEMNIFICATION. Generator shall defend, indemnify and hold harmless Recycling/TSD Contractor, its past, present and future officers, directors, employees, agents, insurers and successors (hereinafter in this Paragraph referred to collectively as "Recycling/TSD Contractor") from and against any and all Loss which Recycling/TSD Contractor may sustain or incur, be responsible for or pay out as a result of:
 - (a) Generator's breach of any representation, warranty, term or provision of this Agreement; or
- (b) The negligence or intentional misconduct of Generator, its employees, agents, representatives or subcontractors in the performance of this Agreement, provided that such indemnification shall not apply to the extent such liabilities result from Recycling/TSD Contractor's negligence or intentional misconduct or from a breach of this Agreement by Recycling/TSD Contractor.
- 6. NAMES AND ADDRESSES OF PERSONS TO WHOM NOTICE IS TO BE GIVEN. The name of the person to whom notice is to be given on behalf of Generator appears on the Uniform Hazardous Waste Manifest in Item 16 or the appropriate state manifest. The name of the person to whom notice is to be given on behalf of Recycling/TSD Contractor appears on the Uniform Hazardous Waste Manifest in Item 20 or the appropriate state manifest. The addresses of the persons to whom notice is to be given appear on the Uniform Hazardous Waste Manifest under Item 3 (for Generator) and Item 9 (for Recycling/TSD Contractor) or the appropriate state manifest.

RECYCLING/TSD HANDLING AGREEMENT

(GENERATOR AND RECYCLING/TSD CONTRACTOR)

The undersigned hereby agree that, upon execution of this Recycling/TSD Handling Agreement, there is a binding contract between them according to the above terms and conditions, as of the day and year appearing below.

	PRINT Prices Bond TITLE: Safety Cirector X SIGNATURE: Bus Bond DATE: 0.5/14/92	RECYCLING/TSD CONTRACTOR: PRINT NAME: Daniel W. Belger TITLE: Vice President-Sales SIGNATURE: A.B. J. RECYCLING/TSD CONTRACTOR SHIPMENT APPROVAL NUMBER \$95.32 (W.T. 91-46.17)
STATE HAZARDOUS WASTE MANIFEST DOCUMENT NUMBER: 92000 USP- 14286 -C		USP- 14286 -C

Van Waters & Rogers Inc. . subsidiary of Univar

P. O. 60x UMAHA, NE 68107-PHONE (402) 700.

This Land Disposal Restriction Statement is being forwarded from the original generator of the waste.

Van Waters & Rogers Inc. · · · EPA ID# NED040906729 has acted as a RCRA storage facility.

The Waste is being manifested from storage on Van Waters & Rogers Inc. Manifest / Tearette Lotle (bur)
5-26-92



Notification of Wasz Subject to Land Disposal Restriction

	92002		t				Generate Nam Byron (riginals Inc.	
	lallawing wastes wh	ich ara subject	to the list	ad treatme	nt regulted	routs	1 3004 (a), 1	z waste(s) that is (ac This shipment contain sed even to listed (F	io erom to eno er
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3.	List all D.F.K.U. or F Waste Codes (eg. F006, D003)	Subcatagory (If any)	1 (00. Y/	nility Group tatewater rastewater	3140	il Standard 1253.42 (a	In 40CFR	If Aeguired Mathod Insert proper 5-letter coda	USPCI acceptan
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268.41 Table CCWE-Constituent Concentrations in Waste Extract

	Concentration	on (In man)
F001-F005 apent solvents	Waatewaters containing spant spants	All other track tracks the vice was selected
Acatona n-Butyl alconol Carbon disutilds Carbon tatrachlorida Chiorobenzene Cresola (& Gresylig acid) Cyclohexanona 1,2-Dichiorobenzene Ethyl acatals Ethylenzene Ethyl sthar Isobutanol Methylene chlorida Methyl albyl xatone Mathyl isobutyl xatone Mathyl isobutyl xatone Pyridine Intrachiorosthylene Intrachiorosthylene Intrachiorosthylene Inchiorosthylene 0.05 5.0 1.05 0.05 0.15 2.82 0.125 0.65 0.05 0.05 0.05 0.25 0.20 0.05 0.65 0.88 1.12 0.079 1.12 0.079 1.05 0.082 0.05	0.56 3.0 4.81 0.98 0.08 0.75 0	

268.43 Table CCW-Constituent Concentrations in Wastes

F001, F002, F003, F004 and F005	In Wastes
wastawatan (Pharmacoutlest Industry)	Concentration
Methylene chlorida	(In mg/l)
The state of the s	0.44
F002 and F005	

Page			0.44
F002 and F005 1.1.2-Triahlomethans (F002)	· In	Conce	niration mg/kg(nww)
Senzene (F005)		0.030 0.070 Required	7.8 3.7 Method(a)
C-III1 No		Required	Helhod(3)

California List Wasta (applies to all states)
Liquid hazardous wasta including free liquids associated with any solid or sludge containing the following constituents or characteristic:

Aranic Cyanides Destruction/Stabilize Cadmium 2 600 Metals Recovery/Solidification Chromium (VI) 2 500 Metals Recovery/Solidification Land Metals Recovery/Solidification Land Metals Recovery/Solidification Mactury 2 500 Metals Recovery/Solidification Nickel 2 20 Metals Recovery/Solidification Selenuim 2 104 Metals Recovery/Solidification Traillium 2 100 Metals Recovery/Solidification	Ciamida.	Concentration	Treamment Standard
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POTENTIAL HAZARDS

FIRE OR EXPLOSION

Flammable/combustible material; may be ignited by heat, sparks or flames. May burn rapidly with flare-burning effect.

HEALTH HAZARDS

Fire may produce irritating or poisonous gases. Contact may cause burns to skin and eyes. Runoff from fire control or dilution water may cause pollution.

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry. Stay upwind; keep out of low areas.

Positive pressure self-contained breathing apparatus (SCBA) and structural firefighters' protective clothing will provide limited protection.

CALL CHEMTREC AT 1-800-424-9300 FOR EMERGENCY ASSISTANCE. If water pollution occurs, notify the appropriate authorities.

Small Fires: Dry chemical, sand, earth, water spray, or regular foam. Large Fires: Water spray, fog or regular foam.

Move container from fire area if you can do it without risk.

Apply cooling water to sides of containers that are exposed to flames until well after fire is out. Stay away from ends of tanks.

For massive fire in cargo area, use unmanned hose holder or monitor nozzles; if this is impossible, withdraw from area and let fire burn.

Magnesium Fires: Use dry sand, Met-L-X® powder or G-1 graphite powder.

SPILL OR LEAK

Shut off ignition sources; no flares, smoking or flames in hazard area. Do not touch or walk through spilled material.

Small Dry Spills: With clean shovel place material into clean, dry container and cover loosely; move containers from spill area.

Large Spills: Wet down with water and dike for later disposal.

FIRST AID Move victim to fresh air; call emergency medical care.

In case of contact with material, immediately flush skin or eyes with running water for at least 15 minutes.

Removal of solidified molten material from skin requires medical assistance. Remove and isolate contaminated clothing and shoes at the site.

HAZARDOUS WASTE RECEIVED CHECKLIST

INFORMATION FR	TED FOR EACH INCOME. ON MANIFEST		/		nate of	Reception	on: O	5/27/9
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	O D St.		EPA ID#:	NEDO	40906729	Lir	o d	113
OOT Name: WFSN	ue VE						ode.	922226
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Department of Health & Environment Division of Environment

PHOTO MOUNTING SHEET

Name of Site:_	Hydrocarbon Recyclers	s, Inc.	EPA	ID # KSD007246846
Location: City	2549 N. New York Wichita	_County_	Sedgwick	Legal
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Picture No. 2						
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Department of Health & Environment Division of Environment

PHOTO MOUNTING SHEET

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